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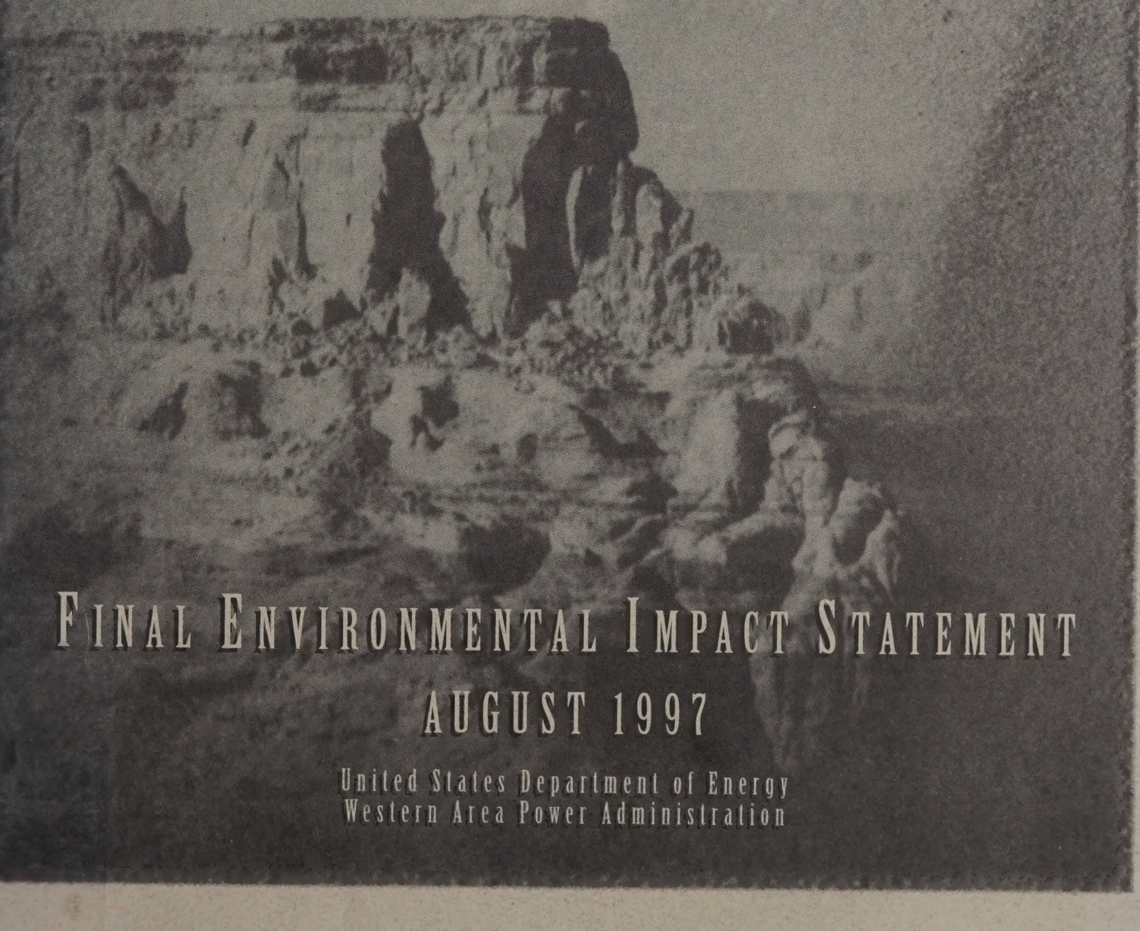
NAVAJO TRANSMISSION PROJECT



FINAL ENVIRONMENTAL IMPACT STATEMENT

AUGUST 1997

United States Department of Energy
Western Area Power Administration

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COVER SHEET

Title: Navajo Transmission Project Final Environmental Impact Statement (FEIS)

Lead Agency:
U.S. Department of Energy
Western Area Power Administration

Cooperating Agencies:
USDA Forest Service
USDI Bureau of Indian Affairs
USDI Bureau of Land Management
USDI National Park Service
Navajo Nation
Hopi Tribe
Hualapai Tribe

Written comments on this EIS should be addressed to:

Mr. Nick Chevance
Western Area Power Administration
Corporate Services Office
P.O. Box 3402
Golden, Colorado 80401
Telephone: (303) 275-1713

For general information on the DOE EIS process, contact:

Ms. Carol Borgstrom, Director
Office of NEPA Policy and Assistance (EH-2)
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585
Telephone: (202) 586-4600

ABSTRACT

Diné Power Authority, a Navajo Nation enterprise, proposes to construct a 500 kilovolt transmission line planned to deliver electrical power from the Shiprock Substation in northwestern New Mexico to the Marketplace Substation in southern Nevada. The line would relieve constraints on transmission of electricity west from the Four Corners area; improve operational flexibility and reliability of the overall system; and allow increased economical transfers, sales, and purchases in the Rocky Mountains/Four Corners/Desert Southwest region. Also, the project allows an opportunity for the Navajo Nation to participate in the electrical utility industry and promote economic development to benefit the people of the Navajo Nation. Six alternatives were considered and include (1) energy conservation and electric load management, (2) new generation facilities, (3) use of existing transmission systems, (4) alternative transmission technologies, (5) no action, and (6) the proposed action. For the proposed action, the following alternative routes and ancillary facility locations are addressed in the EIS: four alternative routes and five substations in the eastern portion of the project area; and six alternative routes, three substation sites, and a microwave communication facility in the western portion of the project area. The existing condition of the environmental resources in the project area is described, and potential impacts on those resources as a result of the proposed action are addressed. The impacts of the proposed action would be caused mainly by access roads, tower sites, and other associated facilities on soils, vegetation, wildlife, and cultural and paleontological resources; and the impact of the transmission line's presence on visual resources and land uses. Public comments on the draft EIS are addressed in this FEIS.

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Table of Contents
List of Figures
List of Tables

TABLE OF CONTENTS

List of Figures ii
List of Tables ii
Introduction iii

Summary . . . . . S- 1f
  Introduction . . . . . S- 1f
  Purpose and Need . . . . . S- 2f
  Alternatives Including the Proposed Action . . . . . S- 4f
  Alternative Routes . . . . . S- 9f
  Affected Environment S-19f
  Environmental Consequences S-21f
  Scoping, Consultation, and Coordination S-26f
  DEIS Review S-27f
  Modifications, Addenda, and Corrections S-28f
  Decisions to be Made S-29f

Chapter 1 - Public Review of the DEIS 1- 1f
  Public Review Process 1- 1f
  Results of the Comment Analysis 1- 1f
  Responses to Comments 1- 9f
  Written Comments and Agency Responses 1-12f

Chapter 2 - Modifications, Addenda, and Corrections 2- 1f
  Modifications 2- 1f
  Addenda 2- 7f
  Corrections 2-13f

Appendices
  A - Summary of Public Hearing Comments and Agency Responses
  B - Summary of Written Comments Received at the Public Hearings and Agency Responses

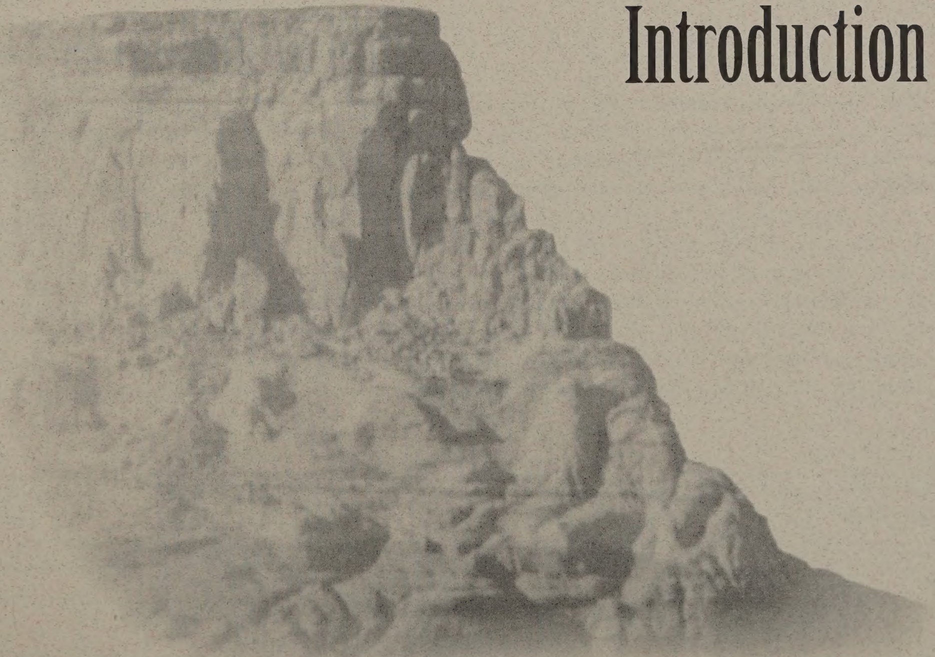
LIST OF FIGURES

S-1f Project Vicinity .... S- 1f
S-2f Typical 500kV Structure Types .... S- 6f
S-3f Right-of-way .... S- 7f
S-4f View of Typical 500kV Substation .... S- 8f
S-5f Diagram of Typical Construction Activities S-10f
S-6f Environmental Process S-11f
S-7f Alternative Routes Compared S-13f
S-8f Issue Areas—Eastern Area Alternatives S-16f
S-9f Issue Areas—Western Area Alternatives S-17f
1-1f Open House and Hearing Locations 1- 2f
2-1f Realignment Dennehotso to Black Mesa 2- 3f

LIST OF TABLES

S-1f Comparison and Ranking of Alternative Routes—Eastern Area S-14f
S-2f Comparison and Ranking of Alternative Routes—Western Area S-15f
1-1f Open Houses and Hearings 1- 3f
1-2f Common Issues and Relative Degree of Concern 1- 5f
1-3f List of Parties Who Provided Written Comments 1-13f
1-4f Written Comments and Agency Responses 1-15f
2-1f Corrections to the DEIS 2-14f

Introduction



INTRODUCTION

Diné Power Authority (DPA), an enterprise of the Navajo Nation, proposes to construct, operate, and maintain a 500 kilovolt (kV) transmission line from Shiprock Substation in the Four Corners area in northwestern New Mexico to the Marketplace Substation in southeastern Nevada. Western Area Power Administration (Western), the lead Federal agency responsible for compliance with National Environmental Policy Act (NEPA), prepared the environmental impact statement (EIS) to document the analysis of the potential effects that the proposed action, the Navajo Transmission Project (NTP), could have on the natural, human, and cultural resources in the project area. The preparation of an EIS is required because of Federal government involvement, which includes (1) granting rights-of-way across Federal and tribal lands, and (2) certain participation by Western, an agency of the U.S. Department of Energy (DOE). The EIS process is a Federal action that will require a decision based on minimizing impacts on the natural, human, and cultural resources. The EIS serves as a basis of that decision while providing the opportunity for public input into the decision-making process. The draft EIS (DEIS) and accompanying map volume, published in September 1996, address the affected environment and environmental consequences. Subsequent to the publication of the DEIS, a public review period ensued. Written comments on the DEIS were received from agencies, organizations, and individuals and oral comments were received from the public at a series of public hearings.

In accordance with the Council on Environmental Quality (CEQ) regulations (40 CFR 1503.9), when possible it is DOE and Western's policy to produce final EISs (FEIS) that document the public review formatted to contain the comments on the DEIS, responses to those comments, and substantive changes to the DEIS rather than rewriting and reprinting the DEIS. The DEIS, Appendices A through E, map volume, and FEIS constitute the complete EIS; and the FEIS is intended to be reviewed in conjunction with the other EIS components listed above for a full understanding of the EIS.

ORGANIZATION OF THE EIS

Draft Environmental Impact Statement

The body of the DEIS contains five chapters and is followed by five sections of reference materials. Chapter 1 provides an explanation of the purpose and need for the project, as well as the planning requirements, environmental review, and licensing or permits anticipated to implement the project. Chapter 2 provides a description of the alternatives including the proposed action. This includes examining alternatives to implementing the proposed transmission line, as well as identifying and examining alternative routes for the proposed transmission line. Chapter 3 presents a description of the natural, human, and cultural environment of the project area, as it exists prior to the proposed action. This information served as the baseline data to assess potential impacts of the proposed transmission line. Chapter 4 contains a description of the potential consequences, or impacts, on the environment that could result from no action or implementing the proposed action, and measures to mitigate the impacts. Chapter 5 provides a description of the comprehensive program for agency coordination and public participation that was conducted in concert with the environmental process. The remaining sections provide bibliographic references, list of preparers and contributors, list of acronyms, glossary, and index.

Additional explanatory information that supports the DEIS is included in five appendices. Appendix A contains an overview of the route selection process, including study and analysis methods and tables comparing the alternative routes for each resource. Appendix B provides a comprehensive explanation regarding the addition and/or elimination of alternative routes or segments of alternative routes. Appendix C describes the alternative routes addressed in the DEIS; that is, the four alternative routes in the eastern portion of the project area and six alternative routes in the western portion. Appendix D contains data supporting the biological resources sections of Chapters 3 and 4. Appendix E contains information supporting the land use sections of Chapters 3 and 4.

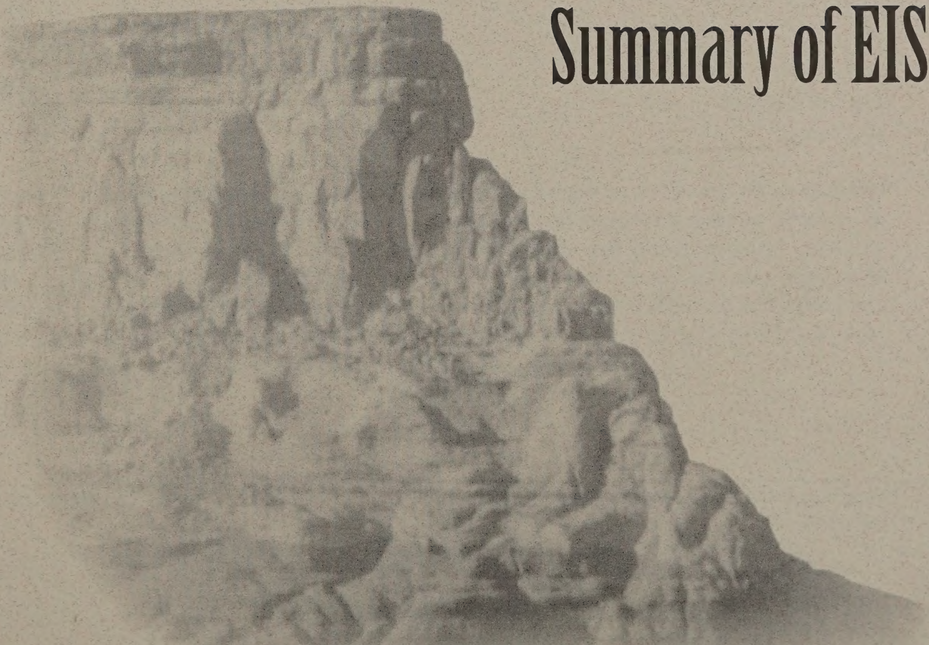
The DEIS is accompanied by a map volume containing 19 maps that illustrate the alternatives and represent the various natural, human, and cultural resources studied for the DEIS. These maps should be reviewed in conjunction with the text of the DEIS. Each map is listed at the beginning of the map volume.

Final Environmental Impact Statement

This document contains a comprehensive summary of the DEIS and FEIS, and two chapters followed by two appendices. Chapter 1 contains a description of the activities associated with the review of the DEIS, a summary of the issues identified from the comments received, and responses to the most commonly expressed issues. In addition, letters received have been reproduced, the comments of which are identified and responses to those comments are provided. Chapter 2 provides a summary of modifications to the project that resulted from comments received since the DEIS was published. Also, Chapter 2 contains addenda and corrections to the DEIS.

For reviewers interested in a more detailed record of comments documented at the hearings, Appendix A contains a summary table of the oral comments given by each speaker and responses to those comments. Appendix B contains a summary table of the written comments submitted at the hearings and responses to those comments.

Copies of the FEIS have been sent to all agencies, organizations, and individuals in Chapter 5 of the DEIS, and to all agencies, organizations, and individuals who have since requested copies.

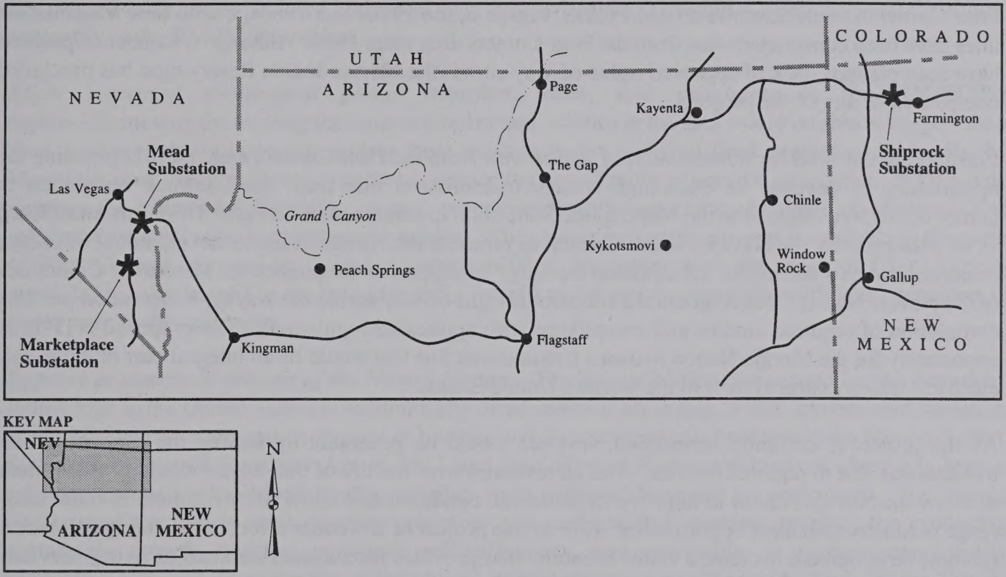


Summary of EIS

SUMMARY

INTRODUCTION

DPA, a Navajo Nation enterprise, proposes to construct, operate, and maintain a 500 kilovolt (kV) transmission line to deliver electric power from the Four Corners area in northwestern New Mexico across northern Arizona to a terminus in southeastern Nevada (Figure S-1f). The proposed project, the NTP, is currently planned to be in service in the year 2001 and operate for about 50 years.


COLORADO
UTAH
ARIZONA
NEVADA
Page
Kayenta
Farmington
Shiprock Substation
Mead Substation
Las Vegas
The Gap
Grand Canyon
Chinle
Kykotsmovi
Window Rock
Peach Springs
Gallup
NEW MEXICO
Marketplace Substation
Kingman
Flagstaff
KEY MAP
NEV
ARIZONA
NEW MEXICO
N

Project Vicinity
Figure S-1f

The preparation of an EIS is required because of Federal government involvement, which includes (1) granting rights-of-way across Federal and tribal lands, and (2) certain participation by Western, an agency of the DOE. In accordance with NEPA, Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 CFR 1500-1508), DOE implementing regulations, and other applicable regulations, Western prepared the EIS to document the analysis of the potential effects that the proposed project could have on the natural, human, and cultural resources in the project area. Western is serving as the lead Federal agency under whose direction the EIS is being prepared.

The following sections provide summary descriptions of the purpose and need for the proposed project; alternatives considered including the proposed project; alternative routes including the environmentally preferred; affected environment; environmental consequences; and scoping, consultation, and coordination.

PURPOSE AND NEED

For more than a decade, regional electrical transmission systems have become increasingly stressed by the lack of adequate bulk transmission capacity west from the Four Corners area in northwestern New Mexico. Several thousand megawatts (MW) of power generation were added in the Rocky Mountains/ Four Corners/Desert Southwest (RM/FC/DS) region in the 1970s and 1980s, but no new transmission lines have been constructed west from the Four Corners area since 1970. Although a number of projects have been planned, lack of approved rights-of-way across the Navajo Indian Reservation has precluded completion of any of the projects.

Considering this need for transmission of power west from the Four Corners area, DPA is pursuing the opportunity to develop an extra-high-voltage transmission line from the Shiprock Substation in northwestern New Mexico to the Marketplace Substation in southeastern Nevada. DPA was established as an enterprise by the Navajo Nation Council to promote the Navajo Nation's development of energy resources and new sources of transmission capacity. In support of the project, the Resources Committee of the Navajo Nation Council granted a conditional right-of-way across the Navajo Reservation pending completion of required studies and compliance with applicable regulations. The proposed NTP is an opportunity for the Navajo Nation to own a transmission line that would be an integral part of a regional electrical transmission system in the western United States.

As the project is currently envisioned, revenue would be generated by leasing the capacity of the transmission line to regional utilities. Annual revenues over the life of the project would provide funds to allow the Navajo Nation to improve its economic condition and allow for investment in other long-range productive business opportunities. NTP is one project of a broader effort of the Navajo Nation to promote development to create a viable economy that provides for a decent standard of living, services, and jobs for the Navajo people.

The purposes and needs for the proposed project are described below.

Relieve the constraints on the transmission of electricity west from the Four Corners area to the Desert Southwest—Currently, more energy can be imported from the north on existing transmission lines into the Four Corners area than is capable of being exported with existing transmission capacity to the west. The existing system is fully committed to transmitting energy from the Four Corners area and is generally heavily loaded, causing the amount of power scheduled across any one line to be periodically cut back to keep flows within established line limits. This transmission "bottleneck" essentially precludes economic sales of electricity to markets in south-central Arizona, Nevada, and southern California for which an estimate of future load growth is more than 10,000 MW during the next 10 years. A project with the characteristics of NTP would play an integral role in meeting a portion of this projected load growth.

Improve operational flexibility and reliability of the extra-high-voltage transmission system in the event of an outage of a parallel transmission system—The extra-high-voltage transmission system west of Four Corners consists of one 500kV and two 345kV transmission lines. Under extreme operating conditions, there is a potential for the 500kV line to fail, an event that would automatically route the power to the 345kV lines and potentially cause an overload on the two 345kV lines. The system could then exceed maximum limits for power flow, which would cause the power generators to slow down or shut off to avoid overloading and damaging the generators and the 345kV lines. NTP would provide additional capacity to support the system. Also, NTP would help enhance the existing transmission system grid in the western United States and contribute to increased reliability, efficiency, and capability, especially in the RM/FC/DS region.

Allow increased economical power transfers, sales, and purchases in the RM/FC/DS region—Removing the existing transmission restriction, utilities in the area would be able to support their peak load periods by importing power from existing hydro and coal-fired generation in the Rocky Mountain area. Such economic purchases reduce the use of more expensive generation. NTP would improve the operational flexibility of area generation facilities and take advantage of economic and seasonal diversity in the electrical power market. When lower cost surplus power is available to the north of Four Corners, it could be "wheeled" across NTP to customers west and south of Four Corners, providing a sales benefit to the provider and a benefit to the purchasing utility ultimately resulting in lower rates to the customers.

Improve economic conditions of the Navajo Nation—The Navajo Nation, the second largest American Indian tribe in the United States, is economically disadvantaged according to U.S. government statistics. Economic indicators suggest an absence of a strong and diverse economic base within the Navajo Nation. Since the Economic Recovery Act of 1981 and later Gramm-Rudman initiatives, there has been a substantial reduction in Federal funding to tribes, and continued decreases are anticipated. The Navajo Nation realizes that it must develop programs and projects that generate revenue for producing sustainable growth, building economic self-sufficiency, and reinvesting in further economically productive activities. Over the life of the project, annual revenues would provide funds for the Navajo Nation to allow for investment in other business opportunities. In addition, development of NTP would provide short-term employment for American Indians during construction in a region that has an unemployment rate of about 30 percent (on the Navajo Reservation). After construction, it is anticipated that there may be limited opportunities for long-term employment in aspects of operation and maintenance of the transmission line. Availability of electricity on Navajo Nation lands also is critical to economic growth and infrastructure development of the Navajo Nation. NTP would allow Western an alternate path for firm-power deliveries, thus reducing dependence and freeing capacity on the Shiprock-to-Glen Canyon 230kV path for increased deliveries to the Kayenta and Long House Valley substations along that path on the Navajo Reservation. That would provide the Navajo Tribal Utility Authority (NTUA) with more flexibility to plan additional distribution of electricity.

Facilitate the Navajo Nation's development of energy resources and participation in the electric utility industry—The role of the Navajo Nation in the energy industry traditionally has been that of a passive resource owner. Nonrenewable resources from Navajo Nation lands are exported to provide fuel for power for much of the western United States. The economy and self-sufficiency of the Navajo Nation depend heavily on the export of these resources. However, the businesses associated with the energy activities are typically non-Navajo. NTP is an opportunity for the Navajo Nation to own a transmission line that would be an integral part of a regional electrical transmission system, thereby establishing a role in the electric utility industry.

ALTERNATIVES INCLUDING THE PROPOSED ACTION

The following discussion addresses alternatives considered but eliminated from further study and project alternatives studied in detail.

Alternatives Considered But Eliminated From Further Study

Energy conservation and electric load management—The intent of this alternative was to promote regional energy conservation among consumers through load management and development of energy standards and electric equipment standards. This requires that the demand for electricity be reduced through conservation. This alternative, however, would meet only a small part of the purposes and needs for the proposed project. It would forestall the increase in regional energy demands only for a short period of time, while having no effect on the transmission system constraints west of the Four Corners area or on the economic condition of the Navajo Nation. Also, it is anticipated that the relief on energy demands brought about by this alternative would be minimal at best because most of the market area, such as southern California and southern Nevada, already has aggressive energy conservation and load management programs in place.

New generation facilities—Building new generation facilities would help meet the increasing energy needs of the southwestern United States and, depending on the location of the generation project, could conceivably benefit the Navajo Nation. However, new generation facilities would not remove the transmission system constraints west of the Four Corners area and, in fact, would aggravate the situation. Not only is new transmission needed to remove existing constraints, but additional new transmission would be needed to accommodate new power generated.

Existing transmission systems—Consideration was given to (1) scheduling power from the Four Corners area to major load areas via different existing transmission paths, (2) using a phase shifting transformer or transmission line compensation on the existing transmission paths, and (3) upgrading Western's 230kV line. All of the electrical paths out of the Four Corners area are often scheduled to maximum capacity, meaning that there is a greater demand for capacity than can be safely scheduled out of the area. In addition, scheduling over alternate paths means a loss of revenue to other utilities who then have to find new paths, as well as absorb the increase in wheeling costs. The results of using a phase shifter or series compensation only partially mitigate the basic problem of lack of capacity available on the existing transmission system. Also, over the past several years Western has implemented upgrades to maximize the capability of its Shiprock-to-Glen Canyon 230kV line; however, the improvements were short term. This alternative has a very low benefit-to-cost ratio.

Alternative transmission technologies—Alternative transmission technologies considered were (1) using voltage levels other than 500kV, (2) direct current (DC) versus alternative current (AC), (3) underground construction versus overland construction, and (4) use of new technologies. Constructing a transmission line at other than 500kV would accomplish fewer of the benefits sought by project proponents. Adjusting the voltage level would result in either increased costs for construction (at higher voltage levels) or compromising capacity (at lower voltage levels). The key difference between DC and AC is the resulting flexibility of the system. The AC system can be interconnected to the existing electrical system more economically. Because of technical complications, economic cost, environmental impacts, and inaccessibility for maintenance, an underground system was not considered a viable alternative. Current research and development for other potential methods for bulk-power transmission of electric energy such as microwave, laser, and superconductors are not currently available for commercial use.

Alternatives Studied in Detail

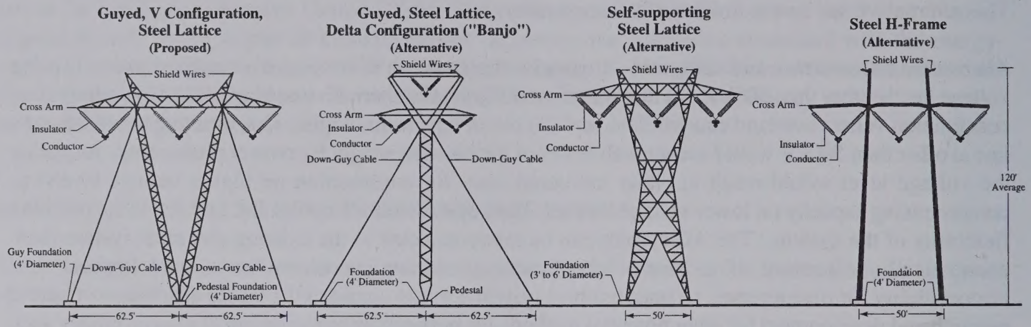
Alternatives studied in detail are no action and the proposed action, including alternative transmission line routes.

No-action alternative—If no action is taken, the right-of-way for NTP would not be acquired and the transmission line would not be built. Advantages of the no-action alternative would include saving of construction costs of the new facilities and the preclusion of associated impacts on the environment. However, the needs of the project, described above, would not be met.

Proposed action—As previously explained, NTP was proposed in the DEIS as a 500kV AC transmission line from Western's Shiprock Substation west of Farmington in northwestern New Mexico to either Western's Mead Substation or Marketplace Substation, both of which are south of Boulder City in southeastern Nevada. The approximate length of the line would be 400 to 500 miles depending on the alternative route selected for construction.

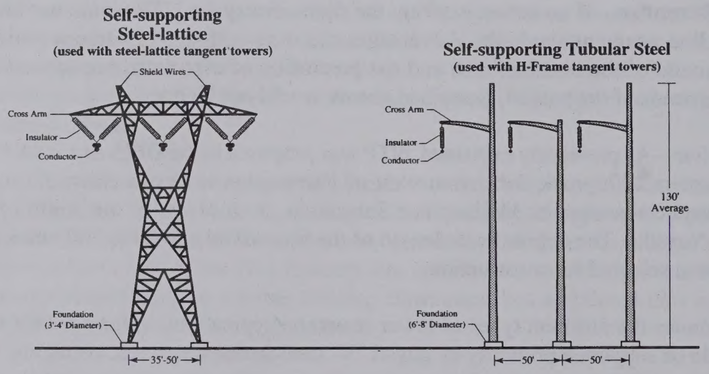
Figure S-2f shows the different types of tower structures typically used for a 500kV transmission line. The line would be supported primarily by guyed "V" steel-lattice structures, averaging 120 feet in height, spaced 1,200 to 1,500 feet apart. Other types of tower structures may be used in certain areas for engineering or economic reasons, or to mitigate environmental impacts. These other types include a guyed "delta", self-supporting steel-lattice, or steel pole. More robust structures would be used in areas of difficult terrain, areas where the span of the transmission line would be longer than normal, or where the line would angle or turn.

Typical 500kV Tangent Structure Types


Guyed, V Configuration, Steel Lattice (Proposed)
Shield Wires
Cross Arm
Insulator
Conductor
Guy Foundation (4' Diameter)
Down-Guy Cable
Down-Guy Cable
Pedestal Foundation (4' Diameter)
62.5'
62.5'
Guyed, Steel Lattice, Delta Configuration ("Banjo") (Alternative)
Shield Wires
Cross Arm
Insulator
Conductor
Down-Guy Cable
Down-Guy Cable
Foundation (4' Diameter)
Pedestal
62.5'
62.5'
Self-supporting Steel Lattice (Alternative)
Shield Wires
Cross Arm
Insulator
Conductor
Foundation (3' to 6' Diameter)
50'
Steel H-Frame (Alternative)
Shield Wires
Cross Arm
Insulator
Conductor
120' Average
Foundation (4' Diameter)
50'

Note: Dimensions are approximate

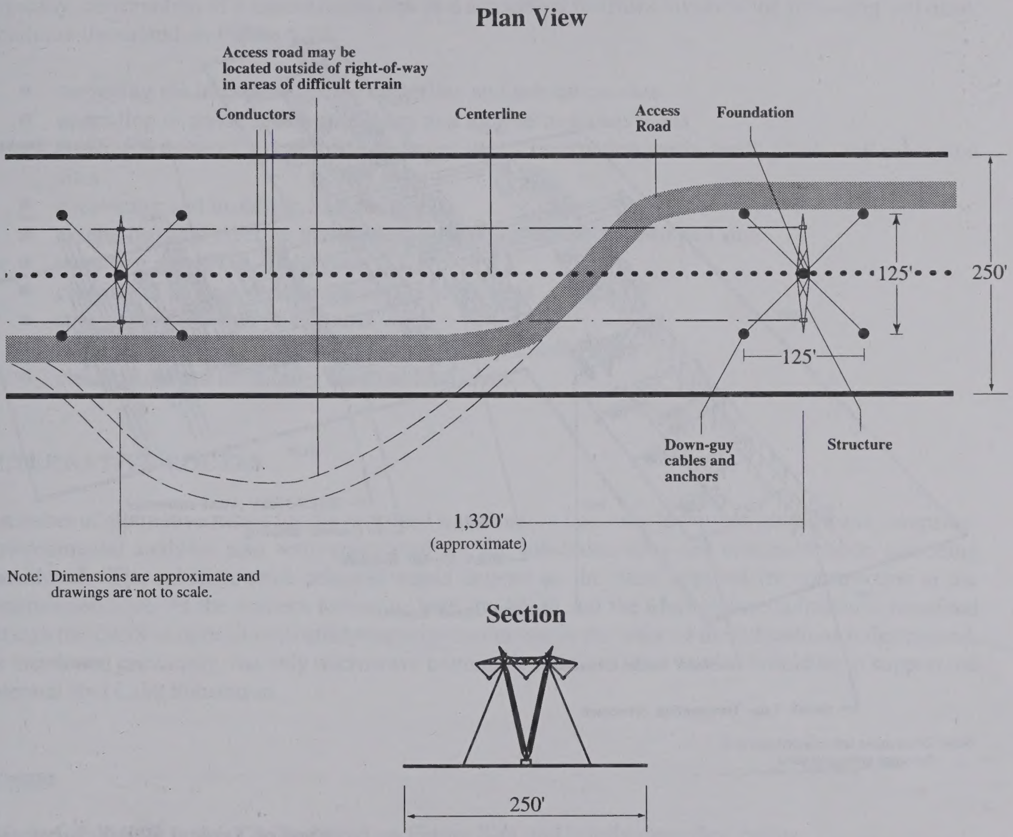
Typical 500kV Dead-end Structure Types


Self-supporting Steel-lattice (used with steel-lattice tangent towers)
Shield Wires
Cross Arm
Insulator
Conductor
Foundation (3'-4' Diameter)
35'-50'
Self-supporting Tubular Steel (used with H-Frame tangent towers)
Cross Arm
Insulator
Conductor
130' Average
Foundation (6'-8' Diameter)
50'
50'

Note: Dimensions are approximate

Typical 500kV Structure Types
Figure S-2f

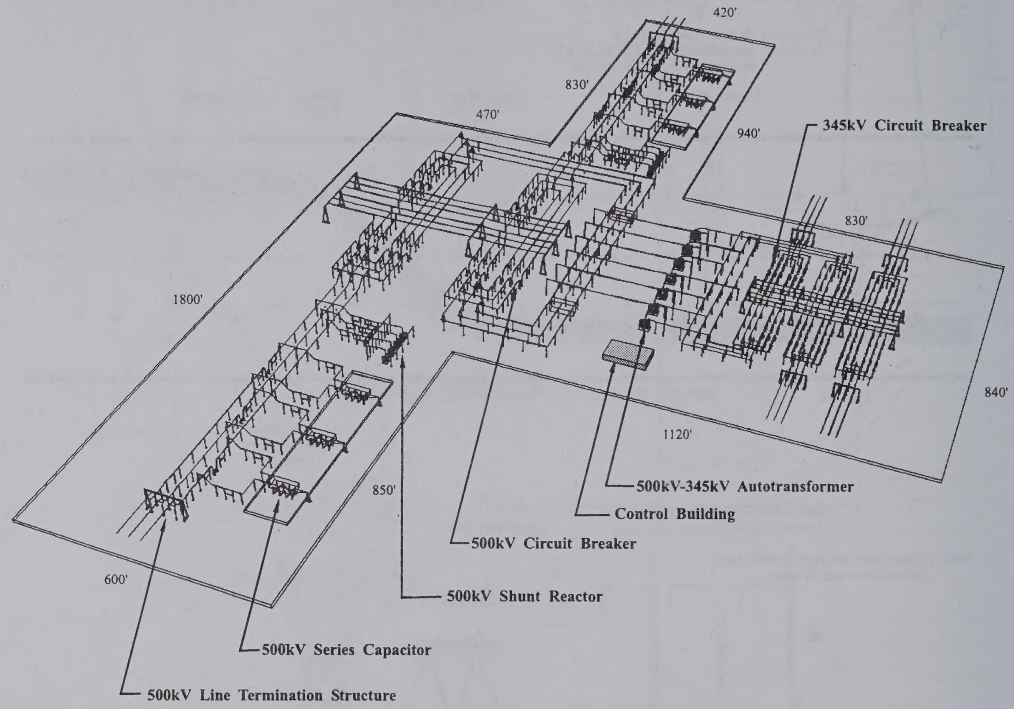
The right-of-way, or the strip of land over which the transmission line would cross, would be 250 feet wide. Figure S-3f illustrates the right-of-way concept for NTP. Additional right-of-way may be required in areas where the proposed transmission line would turn a sharp angle, for installation of ground rods, and access roads outside of the 250-foot-wide right-of-way. Also, areas used temporarily (e.g., staging areas, batch plants) may require temporary use permits.


Plan View
Access road may be located outside of right-of-way in areas of difficult terrain
Conductors
Centerline
Access Road
Foundation
125'
250'
125'
Down-guy cables and anchors
Structure
1,320' (approximate)
Note: Dimensions are approximate and drawings are not to scale.
Section
250'

Right-of-way
Figure S-3f

New substation facilities would be needed. New equipment would be required at the existing substations at the eastern end and western end of the transmission line. A new substation would be developed in an intermediate location along the line. A view of a typical 500kV substation is shown on Figure S-4f on the following page.

To supplement the existing microwave communication system, fiber optic cable may be imbedded in the overhead ground wire, and if the Red Lake site were to be chosen for the intermediate substation, a repeater (parabolic dish) would be added to an existing microwave tower on Bill Williams Mountain.


420'
830'
470'
940'
345kV Circuit Breaker
830'
1800'
840'
1120'
850'
500kV-345kV Autotransformer
Control Building
500kV Circuit Breaker
600'
500kV Shunt Reactor
500kV Series Capacitor
500kV Line Termination Structure

Note: Dimensions are approximate and drawings are not to scale.

View of Typical 500kV Substation
Figure S-4f

Upon selection of a final route for the transmission line and prior to construction, a plan for the development and implementation of the project (a construction, operation, and maintenance plan, or COMP) would be prepared by the project proponents in coordination with the affected regulatory and land-managing agencies. At present, construction of NTP is to begin in late 1998 and would take about 2.5 years to complete. The life of the project is projected to be 50 years.

There is the potential that the transmission line could be constructed in phases; for example, the eastern, central, and/or western portions of the project could be built separately a number of months or even years between the phases. Reasons for phasing construction of the overall project could include the following: response to changing market for transmission capacity, conditions and status of financing, socioeconomic objectives, and/or jurisdictional constraints (e.g., Bennett Freeze).

Typically, construction of a transmission line and associated facilities involves the following activities, which are illustrated on Figure S-5f:

- surveying the transmission line centerline and substation sites
- upgrading or constructing temporary and long-term access roads
- clearing activities for right-of-way, tower sites, construction yards, batch plants, and substation sites
- excavating and installing foundations
- assembling and erecting towers with temporary and permanent pad sites
- installing substation equipment
- clearing of pulling, tensioning, and splicing sites
- stringing conductors and ground wires
- installing counterpoise (tower grounds) where needed
- cleaning up and reclaiming affected land areas

ALTERNATIVE ROUTES

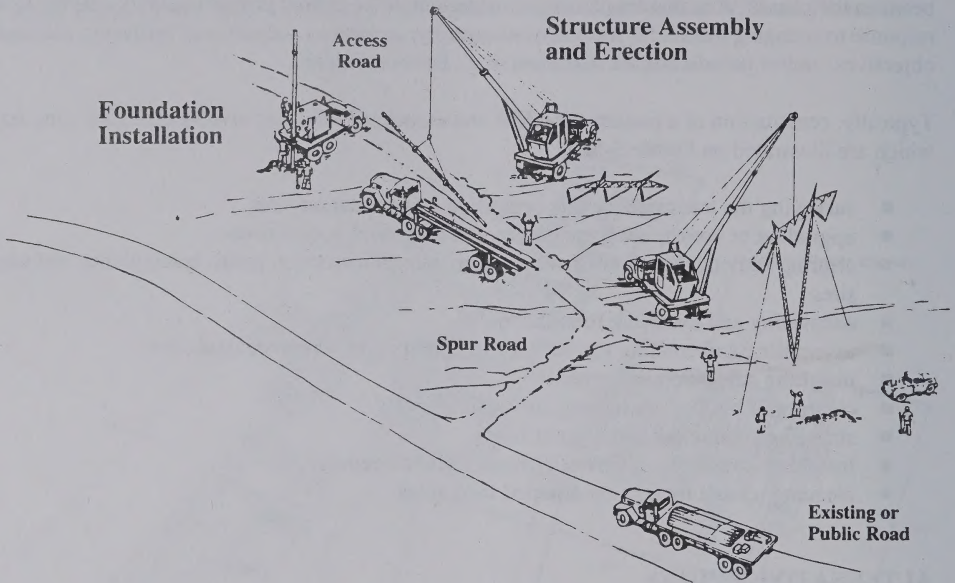
A number of alternative routes for the proposed transmission line were identified, studied, and compared. Environmental analyses also were completed for the substation sites and communication site being considered. The substation site selected would depend on the route selected for construction of the transmission line. At the western terminus, both the Mead and the Marketplace substations remained through the DEIS as options until utility participation in one or the other of the substations is determined. As mentioned previously, the only microwave communication facilities needed would be to support the potential Red Lake Substation.

Process

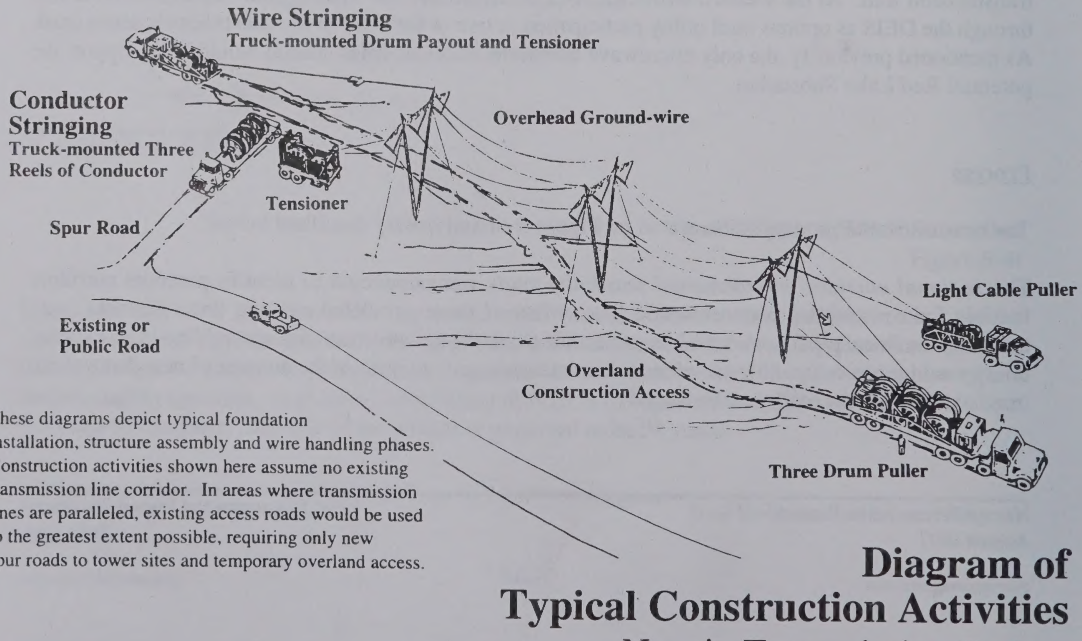
The environmental process is illustrated on Figure S-6f and briefly described below.

The *regional corridor environmental feasibility study* was conducted to identify potential corridors feasible for constructing a transmission line. Most of these paralleled existing linear features (e.g., transmission lines, pipelines), which is preferable since the construction of a second line in an existing utility corridor is a compatible use of land, less intrusive, and minimizes the amount of new disturbance (e.g., existing access roads can be used).

Foundation and Structure Construction Activities


Access Road
Structure Assembly and Erection
Foundation Installation
Spur Road
Existing or Public Road

Conductor and Ground-wire Stringing Activities

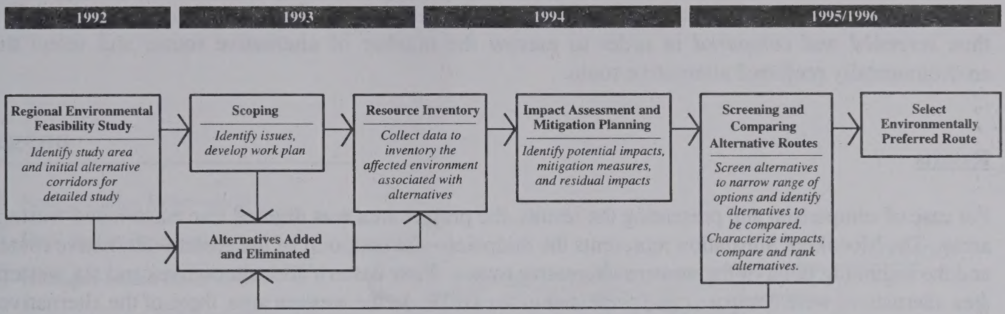

Wire Stringing
Truck-mounted Drum Payout and Tensioner
Conductor Stringing
Truck-mounted Three Reels of Conductor
Overhead Ground-wire
Tensioner
Spur Road
Light Cable Puller
Existing or Public Road
Overland Construction Access
Three Drum Puller

These diagrams depict typical foundation installation, structure assembly and wire handling phases. Construction activities shown here assume no existing transmission line corridor. In areas where transmission lines are paralleled, existing access roads would be used to the greatest extent possible, requiring only new spur roads to tower sites and temporary overland access.

Diagram of Typical Construction Activities

Navajo Transmission Project

Figure S-5f


1992
1993
1994
1995/1996
Regional Environmental Feasibility Study
Identify study area and initial alternative corridors for detailed study
Scoping
Identify issues, develop work plan
Resource Inventory
Collect data to inventory the affected environment associated with alternatives
Impact Assessment and Mitigation Planning
Identify potential impacts, mitigation measures, and residual impacts
Screening and Comparing Alternative Routes
Screen alternatives to narrow range of options and identify alternatives to be compared. Characterize impacts, compare and rank alternatives.
Select Environmentally Preferred Route
Alternatives Added and Eliminated

Environmental Process
Figure S-6f

The initial corridors were refined, then reviewed by the public and relevant agencies through *scoping*, which initiated the NEPA process. During scoping, issues and concerns were identified that could help focus the further evaluation of alternatives. Generally, issues were related to project administration and financing, need, benefits, alternative routing, engineering, right-of-way and access, health and safety, and environment.

A *resource inventory* was then conducted for each alternative route to establish the baseline of existing environmental resources. Environmental issues identified that influenced the direction of the analyses included the following:

- accelerated soil erosion and degradation of water quality
- effects on special status plant and wildlife species
- effects on critical habitat, habitat fragmentation, and protection of biodiversity in certain habitats
- placing a priority on paralleling existing linear features
- effects on residences, agriculture, and timber management
- proximity of the transmission line to communities
- restricting uses within or adjacent to the proposed right-of-way
- proximity to and effects on parks, preservation, and recreation areas
- effects on scenic quality
- effects on cultural resources including archaeological sites, special status sites, and traditional cultural places
- effects of electric and magnetic fields on the health of humans and animals

Once data were compiled, potential environmental impacts that could result from implementing the project were assessed. During *impact assessment and mitigation planning*, initial impacts of the project on each resource were identified, measures to effectively mitigate the impacts were recommended, and residual impacts (those that remain after mitigation) were determined. All of the alternative routes were then *screened and compared* in order to narrow the number of alternative routes and select the environmentally preferred alternative route.

Results

For ease of comparison and presenting the results, the project area was divided into eastern and western areas. The Moenkopi Substation represents the midpoint—the endpoint of the eastern alternative routes and the beginning point of the western alternative routes. Four eastern area alternatives and six western area alternatives were compared and presented in the DEIS. In the western area, three of the alternatives terminate at the Marketplace Substation and three at the Mead Substation. The alternative routes are listed below and shown on Figure S-7f.

Eastern Area Alternatives

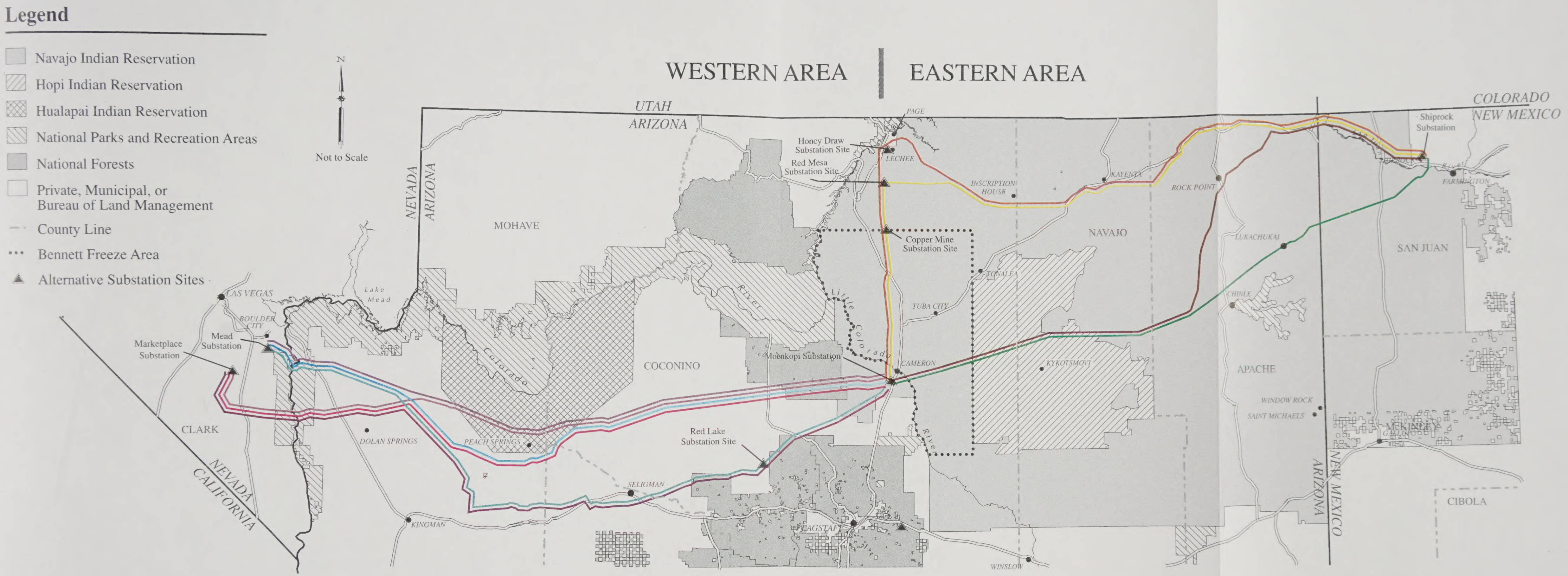
Glen Canyon 1 (GC1)—260.6 miles
Kaibito 1 (K1)—244.7 miles
Central 1 (C1)—186.7 miles
Central 2 (C2)—211.0 miles

Western Area Alternatives

Moenkopi to Marketplace
Northern 1 West (N1W)—217.0 miles
Northern 2 (N2)—225.1 miles
Southern 2 (S2)—247.7 miles

Moenkopi to Mead
Northern 3 (N3)—199.3 miles
Northern 4 (N4)—207.4 miles
Southern 4 (S4)—230.0 miles

These alternatives were compared and ranked based on potential impacts and key issues (Tables S-1f and S-2f). In most locations, the issues and adverse impacts could be mitigated and the impacts remaining overall would be predominantly low (indiscernible-to-slight change to the environment) and some moderate (slight-to-substantial change). Only in some areas did high impacts (substantial-to-significant change) remain that could not be wholly resolved at this stage of the project. These potentially high impacts are associated with certain areas of traditional cultural places and visual resources (Figures S-8f and S-9f).


Legend
▨ Navajo Indian Reservation
▨ Hopi Indian Reservation
▨ Hualapai Indian Reservation
▨ National Parks and Recreation Areas
▨ National Forests
☐ Private, Municipal, or Bureau of Land Management
County Line
Bennett Freeze Area
▲ Alternative Substation Sites
N
Not to Scale
WESTERN AREA
EASTERN AREA
UTAH
ARIZONA
COLORADO
NEW MEXICO
NEVADA
ARIZONA
NEVADA
CALIFORNIA
ARIZONA
NEW MEXICO
PAGE
Honey Draw Substation Site
Red Mesa Substation Site
LECHEE
Copper Mine Substation Site
INSCRIPTION HOUSE
KAYENTA
ROCK POINT
Shiprock Substation
FARMINGTON
River
MOHAVE
NAVAJO
SAN JUAN
LUKACHUKAI
TONALEA
TUBA CITY
CHINLE
Little Colorado River
Colorado River
LAS VEGAS
BOULDER CITY
Lake Mead
Marketplace Substation
Mead Substation
Moenkopi Substation
CAMERON
KYKOTSMOVI
COCONINO
APACHE
WINDOW ROCK
SAINT MICHAELS
GALLUP
McKINLEY
CLARK
DOLAN SPRINGS
PEACH SPRINGS
Red Lake Substation Site
SELIGMAN
KINGMAN
FLAGSTAFF
WINSLOW
CIBOLA

FINAL ALTERNATIVE ROUTES

Eastern Area

Shiprock to Moenkopi

- Glen Canyon 1 (GC1)
- Kaibito 1 (K1) (Preferred route)
- Central 1 (C1)
- Central 2 (C2)

Western Area

Moenkopi to Marketplace

- Northern 1 West (N1W) (Preferred route)
- Northern 2 (N2)
- Southern 2 (S2)

Moenkopi to Mead

- Northern 3 (N3)
- Northern 4 (N4)
- Southern 4 (S4)

Alternative Routes Compared

Navajo Transmission Project

Figure S-7f

TABLE S-1f
COMPARISON AND RANKING OF ALTERNATIVE ROUTES
EASTERN AREA

No Action	GLEN CANYON 1 (GC1)	KAIBITO 1 (K1)	CENTRAL 1 (C1)	CENTRAL 2 (C2)
If no action is taken, the right-of-way for NTP would not be granted and the transmission line would not be constructed. Funds for the new facilities would not be expended and the environment would remain as it presently exists. However, the need for the project would not be met. Constraints on the transmission of electricity in the area would not be relieved; operational flexibility and reliability of the high-voltage transmission system would not be improved; and economical power transfers, sales, and purchases in the area would not increase. The Navajo Nation would forego the economic benefits from the project and would have to seek other means to improve its economic conditions and develop energy resources. Landowners and land users would not benefit from compensation for rights-of-way or damages. Counties and local communities would not benefit from the purchase of goods and services during construction, nor from potential long-term tax benefits. Short-term employment during construction and long-term employment opportunities in operation and maintenance would not be realized. Also, this alternative would forego the opportunity to develop detailed cultural and paleontological resource inventories and recovery of data that might be undertaken to mitigate impacts of the proposed project.	**Preference ranking: 2** GC1 is the longest of the four alternatives, 260.6 miles which is 73.9 miles longer than the most direct alternative, C1. Approximately 19% of GC1 would be new transmission line corridor. The majority of this route, (98%) crosses the Navajo Reservation with a limited amount of BLM (1%), private (1%), and state land (<1%) crossed. **Issue Areas** Key regional or local issue areas include Marsh Pass/northern Black Mesa, the vicinity of Page and Lechee, and the vicinity of Cameron. Other local issue areas include the The Hogback, northern San Juan River crossing, and The Gap. **Significant Unavoidable Adverse Impacts** *Visual Resources:* GC1 is very similar to K1, both resulting in the greatest amount of high impacts on scenic quality and views from high sensitivity roads. GC1 also would result in the greatest amount of high impacts on views from residences. *Traditional Cultural Places* (TCPs): Located north of the Chuska Mountains and on the northern edge of Black Mesa, GC1 avoids many sensitive Navajo TCPs and would result in the least amount of high impact on Navajo TCPs (similar to K1). However, this alternative would result in the highest impacts on Hopi TCPs.	**Preference ranking: 1** K1 is the second longest alternative, 244.7 miles, which is 58 miles longer than the most direct alternative route, C1. Approximately 27% or 65.9 miles of K1 would be new transmission line corridor. Almost the entire route (99%) crosses the Navajo Reservation with a limited amount of BLM (1%) and state land (<1%) crossed. **Issue Areas** Key regional or local issue areas include Marsh Pass/northern Black Mesa and the vicinity of Cameron. Other local issue areas include The Hogback, northern San Juan River crossing, and The Gap. **Significant Unavoidable Adverse Impacts** *Visual Resources*: Similar to GC1, this alternative would result in the greatest amount of high impacts on scenic quality and views from high sensitivity roads. However, K1 would result in slightly fewer miles of high impacts on views from residences by avoiding the Page and Lechee area. *Traditional Cultural Places:* Being north of the Chuska Mountains and on the northern edge of Black Mesa, K1 avoids many sensitive Navajo TCPs, and would result in the least amount of high impacts on Navajo TCPs (similar to GC1). High impacts on Hopi TCPs would be slightly less than GC1.	**Preference ranking: 4** C1 is the most direct alternative between Shiprock and Moenkopi. C1 is 186.7 miles long and parallels existing transmission lines for approximately 94% (176.3 miles) of the route. Only 10.4 miles (6%) of this route would be new transmission line corridor, the least of any alternative. A majority of this route crosses the Navajo Reservation (81%) and the Hopi Reservation (18%). Other jurisdictions crossed include BLM (1%) and private lands (<1%). **Issue Areas** Key regional or local issue areas include the Chuska Valley, Chuska Mountains, southern Black Mesa, and the vicinity of Cameron. Other local issue areas include the San Juan River Valley, the southern crossing of The Hogback, the vicinity of Lukachukai, and Chinle Valley. **Significant Unavoidable Adverse Impacts** *Visual Resources:* Due to the amount of existing transmission lines that would be paralleled by C1, high visual impacts would occur only on views from residences in a localized area of new corridor (0.6 mile) near The Hogback. *Traditional Cultural Places:* C1 crosses the Chuska Valley, Chuska Mountains, and southern Black Mesa, resulting in the greatest amount of high impact on Navajo TCPs. However, C1 results in the least amount of high impact on Hopi TCPs due to the amount of existing transmission lines that would be paralleled.	**Preference ranking: 3** C2 is the second most direct route between Shiprock and Moenkopi. C2, 211 miles long, parallels existing transmission lines for 69% (145.3 miles) of the route. A majority of C2 crosses the Navajo Reservation (83%) and Hopi Reservation (16%). Other jurisdictions crossed include BLM (1%) and state lands (<1%). **Issue Areas** Key regional or local issue areas include southern Black Mesa and the vicinity of Cameron. Other local issue areas include the northern crossing of the San Juan River and The Hogback. **Significant Unavoidable Adverse Impacts** *Visual Resources:* C2 avoids high impacts on scenic quality in areas of new corridor, but would result in high impacts on views from residences (slightly less than K1) and views from moderate sensitivity roads in the vicinity of Sweetwater, Carson Mesa, and the Chinle Valley. *Traditional Cultural Places:* C2 avoids the Chuska Valley and Chuska Mountains, but would result in high impacts on Navajo TCPs associated with the southern crossing of Black Mesa. High impacts on Hopi TCPs are greater than C1, because of the extent of new corridor. The level of impacts on Hopi TCPs would be comparable to K1.

Note: Issue areas and significant unavoidable adverse (high) impacts are illustrated on Figure S-8f.

TABLE S-2f
COMPARISON AND RANKING OF ALTERNATIVE ROUTES
WESTERN AREA

NO ACTION	MOENKOPI TO MARKETPLACE ALTERNATIVES			MOENKOPI TO MEAD ALTERNATIVES		
	NORTHERN 1 WEST (N1W)	**NORTHERN 2 (N2)**	**SOUTHERN 2 (S2)**	**NORTHERN 3 (N3)**	**NORTHERN 4 (N4)**	**SOUTHERN 4 (S4)**
If no action is taken, the right-of-way for NTP would not be granted and the transmission line would not be constructed. Funds for the new facilities would not be expended and the environment would remain as it presently exists. However, the need for the project would not be met. Constraints on the transmission of electricity in the area would not be relieved; operational flexibility and reliability of the high-voltage transmission system would not be improved; and economical power transfers, sales, and purchases in the area would not increase. The Navajo Nation would forego the economic benefits from the project and would have to seek other means to improve its economic conditions and develop energy resources. Landowners and land users would not benefit from compensation for rights-of-way or damages. Counties and local communities would not benefit from the purchase of goods and services during construction, nor from potential long-term tax benefits. Short-term employment during construction and long-term employment opportunities in operation and maintenance would not be realized. Also, this alternative would forego the opportunity to develop detailed cultural and paleontological resource inventories and recovery of data that might be undertaken to mitigate impacts of the proposed project.	**Preference ranking: 1** N1W is 217.0 miles in length, and is the most direct route between the Moenkopi and Marketplace substations. N1W parallels existing transmission line corridors for the entire distance (100%). This route crosses several jurisdictions, including BLM (23%), Forest Service (9%) NPS (5%), Navajo Reservation (6%), Hualapai (16%), state (8%), private (33%), Bureau of Reclamation (BOR) (<1%) and Corps of Engineers (COE) (<1%). **Issue Areas** The key regional issue area is the vicinity of the Hualapai Indian Reservation; however, there would be no high impacts along N1W. Other issue areas include the Arizona Trail and Moqui Stage Station, US 180/AZ64, Grand Canyon Railroad, Aubrey Valley, Diamond Creek Road, and Lake Mead NRA. **Significant Unavoidable Adverse Impacts** There would be no significant unavoidable adverse impacts along N1W.	**Preference ranking: 2** N2 is the second longest alternative to the Marketplace Substation at 225.1 miles. Approximately 82%, or 183.6 miles, of N2 parallels existing transmission line corridors. N2 crosses several jurisdictions, including BLM (33%) Forest Service (8%), NPS (5%), Navajo Reservation (6%), state (9%), private (39%), BOR (<1%), and COE (<1%). **Issue Areas** Key regional or local issue areas crossed include the vicinity of the Hualapai Indian Reservation, historic Route 66, and the Music Mountains. Other issue areas include the Arizona Trail and Moqui Stage Station, US 180/AZ64, Grand Canyon Railroad, Aubrey Valley, Truxton Plains, Beale Wagon Road, and Lake Mead NRA. **Significant Unavoidable Adverse Impacts** *Visual Resources:* There would be high impacts on scenic quality in the Music Mountains, and on views from residences, the Proposed Music Mountains Crest Trail, and historic Route 66. *Traditional Cultural Places:* There would be high impacts on Hualapai TCPs particularly in areas where new corridor is needed through traditional Hualapai territory.	**Preference ranking: 3** S2 is the longest of the three alternatives to Marketplace at 247.7 miles. This alternative parallels existing transmission corridors for 161.4 miles, or 65%, of the route, resulting in the greatest amount of new transmission line corridor (35%) among the Marketplace alternatives. However, this alternative also parallels pipeline and/or fiber optic corridors for approximately 70.4 miles. Jurisdictions crossed by S2 include BLM (24%), Forest Service (8%), NPS (4%), Navajo Reservation (8%), state (23%), private (33%), BOR (<1%), and COE (<1%). **Issue Areas** Key regional or local issue areas crossed include the vicinity of the Hualapai Indian Reservation, historic Route 66, the Beale Wagon Road, and Hackberry. Other issue areas include US 180/AZ6, Grand Canyon Railroad, and Lake Mead NRA. **Significant Unavoidable Adverse Impacts** *Visual Resources:* Of the three alternative routes into Moenkopi, S2 would result in the highest impacts on views from residences, historic Route 66, and the Beale Wagon Road. *Traditional Cultural Places:* S2 would have high impacts on Hualapai TCPs particularly in areas where new corridor is needed through traditional Hualapai territory.	**Preference ranking: 1** N3 is the most direct alternative between Moenkopi and Mead, 199.3 miles. This alternative parallels an existing transmission line corridor for the entire distance (100%). Jurisdictions crossed by this alternative include BLM (17%), Forest Service (10%), NPS (7%) Navajo Reservation (7%), Hualapai Reservation (18%), state (9%), private (30%), BOR (2%), and COE (<1%). **Issue Areas** Key issue areas are essentially the same as N1W, with the exception of the crossing of Lake Mead NRA and the Colorado River. Alternatives terminating at the Mead Substation use the northern crossing of the river, parallel to two transmission lines in a rugged canyon setting. This crossing is less favorable to the NPS, Lake Mead NRA. **Significant Unavoidable Adverse Impacts** Similar to N1W, there would be no significant unavoidable adverse impacts along N3.	**Preference ranking: 2** N4 is 207.4 miles in length and parallels existing transmission corridors for 165.9 miles, or 80%, of the route. Jurisdictions crossed by N4 include BLM (28%), Forest Service (9%), NPS (7%), Navajo Reservation (7%), state (10%), private (37%), BOR (2%), and COE (<1%). **Issue Areas** Key issue areas are essentially the same as N2, with the exception of the crossing of Lake Mead NRA and the Colorado River. Alternatives terminating at the Mead Substation use the northern crossing of the river, parallel to two transmission lines in a rugged canyon setting. This crossing is less favorable to the NPS, Lake Mead NRA. **Significant Unavoidable Adverse Impacts** *Visual Resources:* N3 is the same as N2. *Traditional Cultural Places:* N3 is the same as N2.	**Preference ranking: 3** S4 is the longest of the Mead alternatives (230 miles) and parallels existing transmission corridors for 143.7 miles, or 62%, of the route, which is the least of the three Mead alternatives. However, this alternative also parallels pipeline and/or fiber optic corridors for approximately 70.4 miles. Jurisdictions crossed by this route include BLM (18%), Forest Service (9%), NPS (6%), Navajo Reservation (9%), state (25%), private (31%), BOR (2%), and COE (<1%). **Issue Areas** Key issue areas are essentially the same as S2, with the exception of the crossing of Lake Mead NRA and the Colorado River. Alternatives terminating at the Mead Substation use the northern crossing of the river, parallel to two transmission lines in a rugged canyon setting. This crossing is less favorable to the NPS, Lake Mead NRA. **Significant Unavoidable Adverse Impacts** *Visual Resources:* S4 is the same as S2. *Traditional Cultural Places:* S4 is the same as S2.

Note: Issue areas and significant unavoidable adverse (high) impacts are illustrated on Figure S-9f.

Legend

REMAINING HIGH IMPACTS

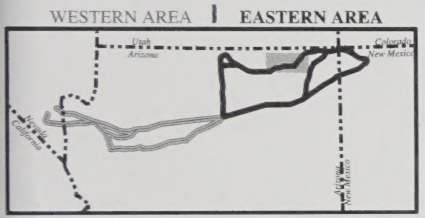
Visual Resources

- ▬ Impacts on Viewers and/or Scenic Quality

Traditional Cultural Places

- ▬ Navajo
- ▬ Hopi
- • • Bennett Freeze Area
- - - Preferred Route
- — Alternatives Routes
- ▲ Alternative Substation Sites
- 582 Link Identifier

Key Map


WESTERN AREA
EASTERN AREA
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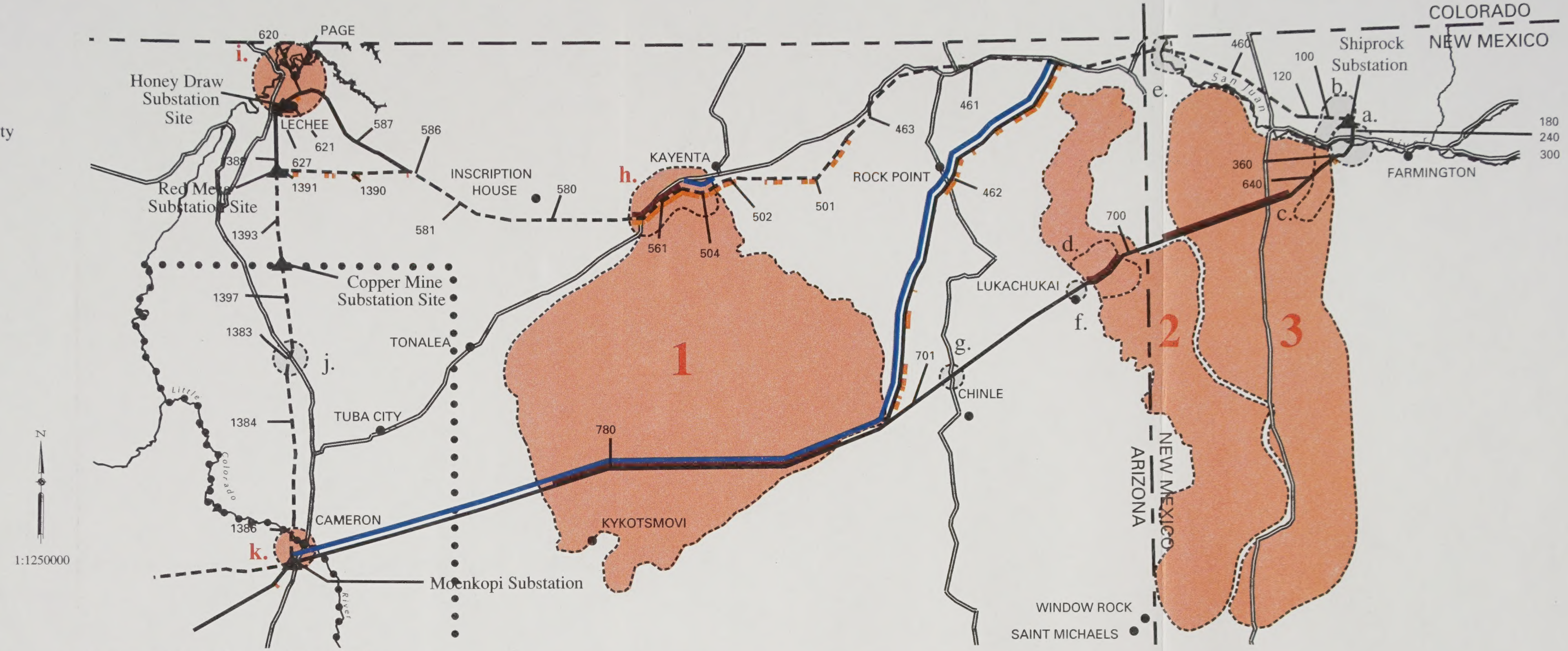
Arizona
Colorado
New Mexico
Nevada
California
Arizona
New Mexico


N
1:1250000
PAGE
620
i.
Honey Draw Substation Site
LECHEE
587
586
621
389
627
1391
1390
Red Mesa Substation Site
1393
INSCRIPTION HOUSE
580
581
Copper Mine Substation Site
1397
1383
j.
TONALEA
Little
1384
TUBA CITY
Colorado
1386
CAMERON
k.
Moenkopi Substation
River
KAYENTA
h.
561
504
502
501
463
461
ROCK POINT
462
1
780
KYKOTSMOVI
701
g.
CHINLE
LUKACHUKAI
f.
700
d.
e.
2
ARIZONA
NEW MEXICO
WINDOW ROCK
SAINT MICHAELS
COLORADO
NEW MEXICO
460
100
120
Shiprock Substation
San Juan
b.
a.
360
640
c.
3
FARMINGTON
180
240
300

KEY ISSUE AREAS

Areas where key issues could not be wholly resolved at this stage of the project are shown in red.

Regional Areas

1. Black Mesa: An area of traditional Navajo and Hopi cultural signifiance and customary land use, including portions of the Marsh Pass Area. Impacts on traditional cultural places would be high.

2. Chuska Mountains: An area of traditional Navajo cultural significance and customary land use and biological concern. Impacts on traditional cultural places would be high. Impacts on sensitive species and big game habitat would be mitigated by paralleling the existing transmission line; limiting new access, tree clearing, and ground disturbance; and adhering to Endangerd Species Act Section 7 requirements.

3. Chuska Valley: An area of traditional Navajo cultural signifiance and customary land use. Impacts on traditional cultural places would be high.

Local Areas

a. Town of Waterflow, San Juan River Valley: Impacts on residences, agriculture, and the San Juan River would be mitigated by paralleling existing facilities, judicious placement of towers, and spanning sensitive features.

b. Northern Hogback Area: Impacts on sensitive plants and the ACEC would be mitigated by limiting access, specifying construction practices, and spanning sensitive areas in an existing corridor. This crossing of The Hogback rather than the southern area is preferred by the BLM.

c. Southern Hogback Area: Impacts on The Hogback National Register District, Chaco Protection Site, and sensitive plants would be mitigated by avoidance, limiting access, specifying construction practices, visual mitigation measures, and spanning sensitive areas.

d. Buffalo Pass: Impacts on biological resources (sensitive species and habitat, timber management, and Class A scenery) would be mitigated by paralleling the existing 500kv line, specifying construction practices, limiting access and tree clearing, matching stuctures, using nonspecular conductors, and adhering to Endangerd Species Act Section 7 requirements.

e. San Juan River Crossing: Impacts on proposed critical habitat for special status fish species, and riparian areas would be mitigated by spanning the river and riparian habitat, and specifying construction practices in the existing utility corridor.

f. Lukachukai: Proximity to the town and residences. Impacts would be mitigated by using the existing utility corridor and judicious tower placement.

g. Chinle Valley, Many Farms: Impacts on agricultural lands and existing residences would be mitigated by judicious placement of towers and spanning of cultivated lands in the existing utility corridor.

h. Marsh Pass/Northern Black Mesa: Navajo and Hopi traditional cultural places, Class A Scenery, residential views, archaeological resources, raptor habitat, and soil erosion. Impacts on traditional cultural places would be high. Visual impacts would remain high in certain areas, but would be reduced overall through the use of nonspecular conductors, dulled tower finishes, and judicious placement of towers. Archaeological, biological, and soil impacts would be mitigated by limiting access, constructing by helicopter, spanning sensitive areas, and judicious placement of towers.

i. Page and Lechee Area: Proximity to Lechee and outlying residences, existing recreational use, future development plans, and visual concerns. Impacts would be partially mitigated by locating this alternative in a new corridor that crosses the edge of the city, judicious placement of towers, and visual mitigation measures. Planned open space and industrial areas could not be avoided.

j. The Gap: Potential land use impacts would be mitigated by locating facilities between two existing transmission lines and spanning water-treatment ponds.

k. Cameron: Using existing corridors and judicious placement of towers would reduce site-specific impacts; however the cumulative effects of multiple transmission lines and restrictions on future land use would remain.

Issues Areas

Eastern Area Alternatives

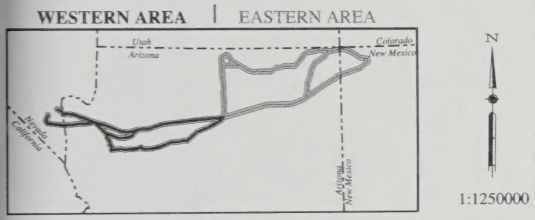
Navajo Transmission Project

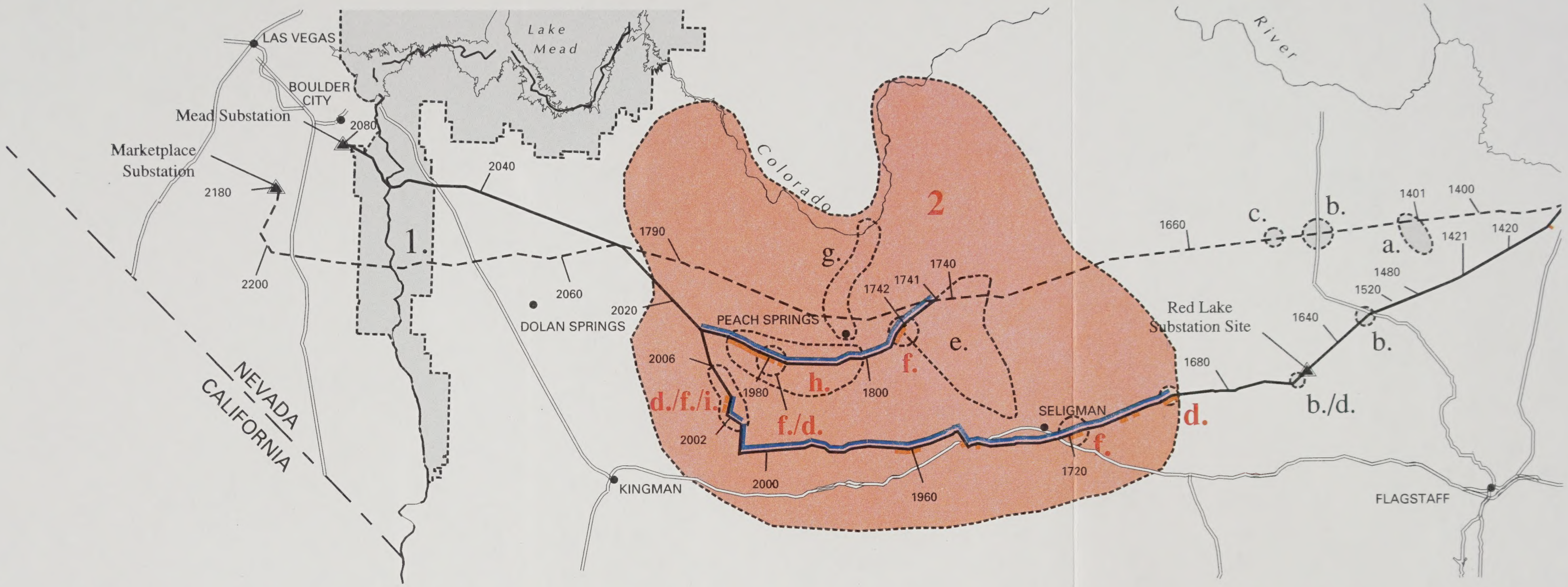
Figure S-8f

Legend

REMAINING HIGH IMPACTS
Visual Resources
▬ Impacts on Viewers Scenic Quality
Traditional Cultural Places
▬ Hualapai
- - Preferred Route
▬ Alternatives Routes
▲ Alternative Substation Sites
1660 Link Identifier

Key Map





KEY ISSUE AREAS

Areas where key issues could not be wholly resolved at this stage of the project are shown in red.

Regional Areas

1. Lake Mead NRA: Two alternative routes cross the Lake Mead NRA and Colorado River. Areas east and west of the river provide sensitive habitat for desert bighorn sheep, desert tortoise, nesting bald eagles along the river and the Lake Mead NRA is an important recreational amenity. Impacts in this area would be mitigated by locating the alternatives in designated utility corridors, specifying construction practices, spanning the river, and use of measures to reduce visual impacts. NPS prefers the southern river crossing because the terrain is less rugged, there is less sensitive habitat, and there is only one existing line crossing the river. However, BLM Kingman Resource Area biologist prefers northern route (Link 2040) because the existing access road has recently been upgraded and parts of Link 2060 are rugged and require upgrading.

2. Vicinity of the Hualapai Indian Reservation: An area of traditional Hualapai cultural significance. Impacts would be high along new corridors in this area.

Local Areas

a. Arizona Trail and Moqui Stage Station: Historic features at this location provide interpretative and recreational opportunities where impacts on views would be mitigated through the use of an existing utility corridor, nonspecular conductors, and judicious tower placement.

b. US 180/AZ 64: This travel route provides access to the south rim of the Grand Canyon. Visual impacts would be mitigated through the use of nonspecular conductors, judicious tower placement, and spanning this road within an existing utility corridor.

c. Grand Canyon Railroad: Visual impacts at the crossing of this historic railroad would be mitigated through use of nonspecular conductors, judicious tower placement, and spanning the railroad within an existing utility corridor.

d. Beale Wagon Road: Visual and cultural impacts at the crossing of this historic trail would be minimized in areas where an existing corridor is used. In areas of new corridor, at Russell Tank and on the Truxton Plain, visual impacts would be high.

e. Aubrey Valley-Black footed ferret management area: The FWS has initiated the reintroduction of a nonessential, experimental population of black-footed ferret in this area. The most critical areas have been avoided and the remaining alternatives are located near the edge of the reintroduction area or are located within an existing utility corridor. Impacts would be mitigated through specifying construction practices and construction timing, and limiting access.

f. Historic Route 66: Route 66 would be crossed in a new corridor resulting in high impacts on views from the highway at four locations, and also would result in high impacts on cultural resources at the crossing in the Truxton Plain area.

g. Diamond Creek Road: This road provides limited access to the Colorado River and Grand Canyon. Visual impacts would be mitigated through the use of nonspecular conductor, matching structures, and judicious tower placement in the existing corridor.

h. Truxton Plains: BLM has expressed concern for impacts on visual quality, big game habitat, and highly erosive soils in this area. Impacts on soils and fragmentation of big game habitat would be mitigated through specified construction practices and limiting access. Impacts on visual quality would be reduced through mitigation measures; however, a small amount of high residual impact would remain in crossing the Music Mountains.

i. Hackberry: Potential land use impacts in and around the town of Hackberry would be mitigated through selection of an alternative route that avoids the community; however, high impacts on residential viewers and viewers on Route 66 would remain.

Issues Areas

Western Area Alternatives

Navajo Transmission Project
Figure S-9f

The four alternative routes in the eastern portion of the project area cross an area of land known as the Bennett Freeze. The Bennett Freeze is a restriction, or "freeze," on development in an area (western portion of the 1934 reservation created by the 1934 boundary bill that defined the borders of the Navajo Nation) disputed by the Navajo and Hopi. The law associated with the land dispute does not preclude all development; rather, it prohibits development of lands *without the consent of both tribes*. The Navajo and Hopi are working toward a resolution; however, in the event that the Bennett Freeze is not lifted in the near future or results of the litigation affects development of the transmission line, DPA and Western developed an alternative to facilitate implementation of NTP. The proposed NTP line would connect into existing transmission lines through one or two substations preferably in the Red Mesa area, and NTP power could be "wheeled" over the existing transmission lines. The existing transmission lines are Western's two 345kV Glen Canyon-Moenkopi-Pinnacle Peak and Navajo Project's two 500kV Navajo-Westwing transmission lines (Western is a participant). System studies indicate that capacity on both the 345kV lines and the 500kV lines may be needed in order to wheel NTP power.

Environmentally Preferred Alternative Routes

In the eastern portion of the project area, the environmentally preferred route is K1, which would connect the Shiprock Substation with either the Red Mesa, Copper Mine, or Moenkopi Substation site. K1 is 244.7 miles long and parallels the Shiprock-to-Glen Canyon 230kV and the Glen Canyon-to-Pinnacle Peak 345kV transmission lines for a total of 178.8 miles (73 percent of the route). High adverse impacts on visual resources would be concentrated in the Kayenta area resulting from introduction of a new transmission line corridor in an area of high scenic quality and potential foreground views from residences. High adverse impacts on traditional Navajo and Hopi cultural places would be minimized using K1 by avoiding the issue areas of the Chuska Valley, Chuska Mountains, and southern portion of the Black Mesa, but would result in the area of northern Black Mesa and Marsh Pass.

In the western portion of the project area, two environmentally acceptable routes were identified in the DEIS—N1W and N3. The two alternatives share the same route for about 152 miles of the eastern majority of the alternative and then diverge to either the Mead Substation or Marketplace Substation. Both alternative routes parallel existing transmission lines along their entire lengths and both cross the Colorado River. N1W parallels a 500kV transmission line and connects the Moenkopi Substation site with the Marketplace Substation. Lake Mead National Recreation Area (NRA) is crossed by both N1W and N3. Even though both N1W and N3 cross the Lake Mead NRA within 1,600-foot-wide designated utility corridors, Lake Mead NRA personnel prefer N1W (the southern crossing of the Colorado River) because the terrain is less rugged, there is less sensitive habitat, and there is only one existing transmission line crossing the river within the utility corridor. N3 would connect Moenkopi Substation with the Mead Substation and uses the northern crossing of the Colorado River, which is traversed by two lines. The western portion of N3 parallels the Mead-to-Liberty 345kV line and the recently constructed Mead-to-Phoenix 500kV line, the access road of which was upgraded during its construction. No high impacts would result along either of these westernmost segments of the western area alternatives (i.e., Links 2040 and 2080 of the northern crossing and Links 2060, 2200, and 2180 of the southern crossing), and both segments are preferred to minimize impacts on traditional cultural places.

AFFECTED ENVIRONMENT

The character of the existing environment in the project area is summarized below.

Climate—The climate is characterized by low relative humidity, a high percentage of sunshine, and relatively large temperature ranges. Temperatures range from the mid 40s to the low 90s in the lowest elevations and from the upper 20s to the mid 60s in the highest elevations. Annual precipitation ranges from approximately 4.2 inches in the lowest elevations to 22.8 inches in the highest elevations.

Air Quality—Air quality in the project area is generally characteristic of rural areas with some influence from industrial areas such as the coal-fired San Juan and Four Corners generating stations. The rest of the project area is sparsely populated with little or no commercial or industrial development. The Glen Canyon NRA, a Class I area (Class I areas are afforded the highest level of protection from air quality degradation, as opposed to Class II and Class III areas) is not crossed by any of the alternative routes. The remainder of the project area is Class II.

Water Resources—The project area lies within an arid region including parts of two major hydrologic regions—the Great Basin system (Nevada portion) and the Colorado River system. There are two major perennial streams within the project area—the San Juan and Colorado rivers. The inventory identified locations of springs, perennial streams, and 100-year floodplains.

Earth Resources—The project area includes portions of three physiographic provinces—Colorado Plateau, Transition Zone, and Basin and Range. Mineral resources of economic importance (e.g., coal, oil, natural gas, uranium) are present in the project area, seismic activity has been identified for portions of the project area in all three states, and soil erosion potentials range from slight to high or severe.

Biological Resources—The project area supports diverse biological resources. The eight major vegetation types present within the project area are habitats for a diversity of wildlife species. Approximately 473 species of wildlife occur including 95 species of mammals, 268 species of birds, 71 species of reptiles and amphibians, and 39 species of fish. Wetlands are limited, occurring at springs or in association with other permanent water bodies.

Special status plant and wildlife species, species of concern to various agencies, are known or have the potential to occur along the alternative routes. Habitat suitable to support approximately 33 special status plant and 104 special status wildlife species have been identified by land-managing agencies including Federal, state, and tribal authorities, as well as the U.S. Fish and Wildlife Service (FWS). Areas designated as critical to support special status species, as defined by the Endangered Species Act, are the San Juan River (Colorado squawfish and razorback sucker), Chuska Mountains (Mexican spotted owl), Colorado River (bonytail chub and razorback sucker), and the Nevada portion of the project area (Mojave desert tortoise). California condors have been released in the Vermillion Cliffs west of Page, and a management area has been established in the Aubrey Valley for reintroducing a population of black-footed ferrets. Both species are designated by FWS as "nonessential, experimental" populations, which reduces the level of protection afforded them under the Endangered Species Act. The reintroduction of black-footed ferret began in March of 1996.

Paleontological Resources—Sedimentary deposits underlying the alternative routes include 51 different geologic units, of which 25 have been assigned a high paleontologic potential, meaning there is a high potential for scientifically important fossils to be located there.

Land Use—The project area is located in portions of New Mexico, Arizona, and Nevada. The land uses inventoried included jurisdictions, as well as existing uses, future uses, and parks, preservation, and recreation areas. Alternative routes cross lands that are privately owned and those administered by Federal, tribal, state, and local agencies. Federal agencies that administer lands include Bureau of Land Management (BLM), Forest Service, National Park Service (NPS), Bureau of Indian Affairs (BIA), and the Bureau of Reclamation. Also crossed are lands of three American Indian groups—Navajo (150 to 275 miles depending on the route selected), Hopi (32.2 miles crossed), and Hualapai (35.1 miles crossed). The San Juan Southern Paiute have no lands designated to the tribe. The Navajo Nation owns (fee simple) land in the Big Boquillas Ranch area and the Hualapai own (fee simple) property near their reservation (Robinson Ranch area), both of which are crossed by alternative routes. The state of Arizona administers and owns land that could be crossed by NTP alternatives. No state lands were identified along the alternative routes in New Mexico or Nevada.

Existing land uses in the project area include residential, agriculture, timber, rangeland for grazing, and mining. Residences are dispersed throughout the project area with a greater number of residences located adjacent to alternative routes in the eastern portion of the project area. There is one area of irrigated agriculture crossed by an alternative near the San Juan River in New Mexico. Timber management areas are in the Chuska Mountains, Defiance Plateau, and Kaibab National Forest. Livestock graze throughout the project area. Numerous individual, small mining claims are dispersed in areas along the alternative routes particularly in the western portion of the project area. Also, the project area is traversed by numerous highways, roads, and linear utilities. The majority of NTP alternative routes parallel existing utility corridors. Generally, the Federal agency management plans and community plans reviewed indicate that the agencies and communities will continue to manage their respective areas for the rural, open space character, allowing for compatible uses.

There are a number of park, preservation, and recreation areas in the project area. On the Navajo Reservation these include tribal parks associated with the Little Colorado River, Lake Powell, and Monument Valley. In addition, there are several natural landmarks on the Navajo Reservation including Shiprock and Comb Ridge. The Hualapai Reservation also maintains a tribal park north of Peach Springs. Preservation and recreation areas located on Federal lands include Lake Mead NRA, areas of critical environmental concern (ACEC) and habitat protection on lands administered by BLM, and forest lands administered by the Forest Service (Kaibab National Forest). Areas designated as recommended or potential wilderness areas are located on the Lake Mead NRA, and in the vicinity of the project at Ireteba Peak and the El Dorado Mountains; however, areas on Lake Mead NRA are crossed in a designated utility corridor and the Ireteba Peak and El Dorado WSAs would not be crossed by the proposed transmission line.

Socioeconomics—The socioeconomic study addressed baseline economic conditions for each of seven counties crossed by NTP alternative routes in three states. The seven counties included an aggregate population of about 1.3 million in 1990 and projections indicate an increase to 1.8 million by the year 2000. The American Indian population in the project area was about 166,000 in 1990, including 155,276 Navajo Reservation residents, 9,199 residents on the Hopi Reservation, and 1,498 residents on the Hualapai Reservation; and in 1996 250 San Juan Southern Paiutes were recorded in the project area. Economic indicators (income, employment, dependency, and household size) show that San Juan County in New Mexico and Apache and Navajo counties in Arizona have relatively high levels of economic dependency and distress compared to other counties in the region. Clark County, Nevada, and Yavapai and Mohave counties in Arizona have substantially higher levels of employment, income, housing value, and educational attainment. Coconino County indicators fall in between the two.

Visual Resources—The project area includes a diverse range of largely undeveloped vistas and open landscapes interspersed with small communities and rural towns. Landscapes are dominated by the distinctive features and landforms of the Colorado Plateau and Basin and Range physiographic provinces. The scenic quality of the large majority of the landscapes crossed by the alternative routes is minimal or average. Lands of outstanding or distinctive scenery accounted for about nine percent of land crossed by the alternative routes.

Cultural Resources—Archaeological and historical sites are abundant throughout the project area, but little of the project area has been intensively inventoried. About 280 previously recorded archaeological and historical sites were identified, within a 0.5-mile-wide corridor, along all the alternative routes. About 15 percent of these are in New Mexico, 81 percent in Arizona, and 4 percent in Nevada.

A total of 10 special status cultural resources were identified within a six-mile-wide corridor. Two of these are in New Mexico, seven in Arizona, and one in Nevada.

The project area encompasses the traditional territories of many American Indian groups who continue to reside in the area, and traditional cultural places along the alternative routes were addressed. Places associated with traditional religions and ceremonies, and other nonritual traditional uses are found throughout much of the project area. Studies were conducted with the involvement of ethnographic specialists and members of the three tribes whose reservation lands would or could be crossed by the proposed transmission line—the Navajo Nation, Hopi Tribe, and Hualapai Tribe.

ENVIRONMENTAL CONSEQUENCES

No Action

If no action is taken, the right-of-way for NTP would not be granted and the transmission line would not be constructed. Funds for the new facilities would not be expended and the environment would remain as it presently exists. However, the need for the project would not be met. Constraints on the transmission of electricity in the area would not be relieved; operational flexibility and reliability would not be improved; and economical power transfers, sales, and purchases in the area would not increase. The Navajo Nation would forego the economic benefits from the project and would have to seek other means to attempt to improve its economic conditions and develop energy resources. Landowners and land users would not benefit from compensation for rights-of-way. Counties and local communities would not benefit from the purchase of goods and services during construction, nor from potential long-term tax benefits. Short-term employment during construction and long-term employment opportunities in operation and maintenance would not be realized. Also, considering cultural and paleontological resources, this alternative would forego the opportunity to develop detailed inventories and recovery of data that might be undertaken to mitigate impacts of the proposed project.

Proposed Action

Potential environmental consequences, or impacts, that could result from the proposed project are summarized below.

Air Quality—Impacts on air quality associated with the transmission line would be short term, occurring only during construction in the form of temporary fugitive dust. Impacts on air quality are anticipated to be low.

Water Resources—Impacts on water resources would be low. Surface water resources (springs and perennial streams) would be spanned by the transmission line. No impacts on ground water are anticipated since construction activities are not expected to reach ground water depths.

Earth Resources—The primary concern of the earth resources investigation was the potential for accelerated soil erosion. Overall, the majority of impacts on soils would be low resulting from the limited extent of ground disturbance causing indiscernible-to-minor increases in erosion rates. Moderate impacts would result in minor-to-substantial increases in erosion rates and occur only in very localized areas where there are soils with severe/high erosion potential in steep terrain. No high impacts are expected.

Biological Resources—The primary concerns regarding biological resources are the effects on special status plants and wildlife species, vegetation (loss of habitat), and wildlife (particularly big game). Areas of concern include The Hogback (Mancos milkvetch and Mesa Verde cactus), Chuska Mountains (big game and biodiversity), northern Black Mesa (raptors), Aubrey Valley (black-footed ferret management area), Truxton Plain (pronghorn), Black Mountains (bighorn sheep), Eldorado Valley (desert tortoise).

Overall, residual impacts on biological resources would be low. Since the majority of the alternative routes parallel existing linear facilities (e.g., transmission lines), the need for new access roads is minimized thereby reducing the amount of vegetation loss and habitat modification. Mitigation is expected to effectively reduce impacts. Measures include carefully placing towers to avoid and/or span sensitive features, minimizing the amount of ground disturbance and loss of habitat, curtailing construction during critical seasons of the life cycles of certain species of wildlife, and restricting public access into sensitive areas (e.g., bighorn sheep and raptor habitat).

Residual impacts on habitats suitable for special status plant and wildlife species are anticipated to be low. The project proponents would be required to adhere to mitigation set forth in a Biological Opinion (U.S. Fish and Wildlife Service, Section 7 of the Endangered Species Act) for species listed as threatened or endangered. Also, the project proponents would coordinate with land-managing agencies to develop measures for species of concern that are not Federally listed.

Paleontological Resources—Potential impacts on paleontological resources are anticipated to be low. The inventory identified areas that have a high potential for yielding paleontological data. Areas considered by the land-managing agencies to be particularly sensitive and could not be avoided by construction activities, would be surveyed and data would be recovered prior to construction.

Land Use—The greatest potential for land use impacts appeared to be potential impacts on residences, but these were mitigable. Impacts on agriculture are expected to be low considering that towers would be judiciously placed. Impacts on timber management are predicted to be moderate in the Chuska Mountains and are low for the remaining portions of the alternative routes. Long-term impacts on grazing would be low because of the minimal amount of disturbance to rangelands and minimal displacement of animal unit months.

Impacts on future land uses would be low based on known future plans along the alternative routes and the use of existing utility corridors. Impacts on parks, preservation, and recreation areas along the alternative routes would be low primarily because the routes follow existing utility corridors.

Socioeconomics—Employment and local purchases during construction of NTP would result in positive direct and indirect socioeconomic effects. Construction costs for NTP are estimated at $332 million (1995 dollars) based on the average length of the alternative routes. Up to 225 people would be employed during project construction; about half of the construction workforce would be hired locally, creating short-term job opportunities. The economy in the project area also would benefit from local purchases of construction materials, and goods and services such as food, lodging, concrete, and fuel. Regional economic modeling was conducted to estimate the direct and indirect economic impacts on individual counties, accounting for multiplier effects that include wages and salaries, and tax revenues. Results show that projected county output would range from $7 million in Yavapai County to $140 million in Coconino County.

Visual Resources—As mentioned, the majority of each alternative route parallels existing transmission lines. In these instances, residual impacts on visual resources would vary from low to moderate. Mitigation measures that would effectively reduce the short- and long-term visual impacts include minimizing new access roads, matching structure locations and types, and using nonspecular conductors. Where NTP would be establishing a new corridor, the construction and operation of the transmission line could result in impacts that range from moderate to high.

Cultural Resources—Impacts on archaeological and historical sites generally are rated as low to moderate throughout the project area. This is primarily a result of the ability to mitigate these impacts through detailed cultural surveys of the selected route and data recovery, where appropriate. Impacts on special status cultural resources are generally rated as low to moderate because most are relatively distant from the alternative routes and their settings already have been affected by previous transmission lines. Impacts on traditional cultural places are rated as high in many locations. None of the alternative routes can avoid all of these high impact areas, particularly on the Navajo and Hopi reservations and south of the Hualapai Reservation.

Electric and Magnetic Fields—The operation of the proposed transmission line was evaluated for "corona" and "field" effects. These potential effects would be similar to or less than other 500kV transmission lines in Arizona. The electric and magnetic fields produced by the NTP line at the edge of the right-of-way would be lower than limit values established by other states (Arizona, New Mexico, and Nevada have no recommended field limits for transmission lines).

Despite the finding that the magnetic fields produced by the NTP transmission line would be below the values set by states with established criteria, and that NTP would result in magnetic field exposures well below those recommended by international and national scientific organizations, additional evaluation was made of research on the potential effects of long-term exposure to magnetic fields. Reports of weak and inconsistent associations between estimated exposure to magnetic fields and human health have not been determined to reflect a causal relationship. Laboratory studies have not provided either a mechanism or experimental basis to identify hazardous effects of exposures at the levels associated with the NTP transmission line. Similarly, a review of agriculture and wildlife studies did not indicate that plants and animals would be disturbed or affected by the fields from the line. One aspect of transmission line operation considered to be of concern is the possibility of induced shock from electricity flowing through or near conductive objects (e.g., irrigation pipes or vehicle antennas). Safety education and strict adherence to the National Electric Safety Code (NESC) for safe distances from conductors are recommended.

The function of some models of cardiac pacemakers or defibrillators, which are implanted in persons to regulate heartbeat, may be affected by electric fields similar to those that would be generated by NTP. However, these fields are already present along existing transmission lines that parallel 60 to 100 percent of the alternative routes. In addition, less than three percent of the devices in use could be susceptible due to design improvements, and it appears that an extremely small percentage of people in the project area would have pacemakers (or would ever come near enough to the line to feel any effects).

Significant Unavoidable Adverse Impacts—No significant unavoidable adverse impacts were identified for biological, earth, paleontological, land use, socioeconomic, air, or noise resources for NTP. Significant unavoidable adverse impacts on visual resources would result in relatively small areas dispersed along the alternative routes (see Figures S-8f and S-9f) and would be associated with views from residences, modification of scenic quality, views from high and moderate sensitivity roads, and views from recreational areas. Significant unavoidable adverse impacts on traditional cultural resources could result in association with Navajo and Hopi traditional cultural places along the eastern area alternatives, and Hualapai traditional cultural places and three special status sites along western area alternatives.

Cumulative Effects—The DEIS addresses the potential cumulative effects of NTP as well. Cumulative effects are the aggregate impacts of an action when added to other past, present, and reasonably foreseeable future actions in the same geographic area. For NTP, the cumulative effects analysis focuses largely on other transmission lines in the area. In fact, the Federal Land Management Policy Act mandates that utility projects should be located within existing utility corridors to minimize cumulative effects. Cumulative effects are discussed by resource in Chapter 4 of the DEIS, but in summary, the majority of NTP is located along existing corridors so the cumulative effects of the project are anticipated to be very small.

Short-term Uses Versus Long-term Productivity—For this project, short term has been defined as the period during construction and shortly thereafter, and long term has been defined as the life of the project (50 years) and beyond. Generally, most environmental resources would experience short-term impacts, principally from construction activities. Long-term effects and productivity would depend on the life of the project and the continued use of the route as a utility corridor.

The majority of impacts on the environment would result from construction-related ground disturbance. Depending on the final route selected, the shortest alternative route (C1 and N3) would result in temporary disturbance of approximately 2,091 acres while temporary disturbance for the longest alternative route (GC1 and S2) would be approximately 2,838 acres during construction of the transmission line. Following construction, the majority of the land disturbed would revert to its preconstruction use (e.g., grazing). Along the shortest alternative route (C1 and N3), transmission line towers would occupy 242 acres while towers along the longest alternative route (GC1 and S2) would occupy 403 acres. The acreages calculated for long-term occupation by the towers represent worst-case conditions; that is, use of a four-legged structure rather than use of a single-pedestal structure (the area displaced would be somewhat more). However, compatible uses (e.g., grazing) could continue in areas occupied by structures. The three substations would occupy approximately 116 acres.

Effects on air quality would result from fugitive dust and gaseous emissions, mainly in localized areas, during construction (short term). Short-term effects on biological resources would result from disturbance of habitat and wildlife. Long-term effects would result from the small amount of habitat displaced for the life of the project. Paleontological resources are nonrenewable and degradation or destruction of these resources through direct impacts of construction, if any, would be permanent.

Regional and local economies could experience short-term benefits from project-related expenditures and employment during construction. Long term, the Navajo Nation would receive revenue from leasing capacity of NTP and some employment may be realized associated with operation of the line. Also, in the long term (50 years and beyond), the project is expected to expand and strengthen the regional electrical power network and to contribute to the economic growth and development of the Navajo Nation. Landowners and land users could benefit from compensation for right-of-way or damages caused by construction. No short- or long-term effects on local infrastructures are anticipated because of the relatively small number of workers that would be required for short periods of time along segments of the line over the course of construction. Potential effects on land uses would be both short term and long term. For the life of the project, existing and future uses in and adjacent to the right-of-way would have to be compatible and could not interfere with the rights granted for the right-of-way.

Cultural resources are essentially nonrenewable and degradation and destruction of these resources through direct impacts of construction would be permanent. Short-term auditory and visual intrusions into the settings of cultural resources would be most intense during periods of construction.

Irreversible and Irretrievable Commitment of Resources—Resources committed to the proposed project would be material and nonmaterial, including financial. Irreversible commitment of resources for the purposes of this section has been interpreted to mean that those resources once committed to the proposed project would continue to be committed throughout the 50-year life of the project. Irretrievable commitment of resources has been interpreted to mean that those resources used, consumed, destroyed, or degraded during construction, operation, maintenance, and abandonment of the proposed project could not be retrieved or replaced for the life of the project or beyond.

SCOPING, CONSULTATION, AND COORDINATION

Scoping, a process open to the public and conducted early in the project, served to identify the range or scope of issues to be addressed during the environmental studies and in the EIS. Activities associated with scoping included (1) agency contacts and coordination with cooperating agencies; (2) public meetings; and (3) letter and newsletter mailings, media releases, and notices posted on and off the Navajo, Hopi, and Hualapai reservations to inform the public and solicit comments.

Representatives of Western and DPA held several meetings with a number of agencies that could have some jurisdictional interest in the project. A total of 25 agency meetings were held. Further, Western requested that Federal agencies and American Indian tribes potentially affected by the project cooperate in preparing the EIS. These cooperating agencies include the Forest Service, BLM, BIA, NPS, Navajo Nation, Hopi Tribe, and Hualapai Tribe.

Seventeen public scoping meetings were conducted by Western at various locations within the project area from August through October in 1993. To announce the project and public scoping meetings, newsletters were mailed, notices were posted, and print and broadcast media were notified. More than 325 people attended the meetings. Comments made at the meetings were documented and a total 131 written comments were received. In general, comments from both the public and agencies related to project need, benefits, the transmission line alternative routes, right-of-way, and health and safety.

The scoping activities described above were part of the comprehensive program for agency coordination and public participation that was developed as an integral part of the environmental process. Since scoping, additional newsletters have been distributed to provide updates on the project. Presentations were made at Hopi and Hualapai community meetings, Navajo Chapter meetings, grazing committee meetings, and various tribal government committee meetings. Displays at Navajo fairs have provided information to the public.

Twenty public information meetings were later held throughout the study area in June 1995 to provide information about the preliminary results of the environmental studies and alternative route analysis. Comments similar to those received during scoping were expressed. Agencies and the interested public had the opportunity to review and comment on the DEIS. The FEIS has been distributed to the public as well.

The cooperating agencies have been involved throughout the process providing input regarding the environmental process and comments on preliminary draft documents. Following the Record of Decision, Western and DPA would continue to coordinate with the cooperating agencies as well as other relevant agencies to develop site- and area-specific mitigation that would be included in the COMP.

Another related element of the environmental process is "environmental justice," which is mandated by Executive Order 12898. The executive order requires that Federal actions avoid disproportionately high and adverse impacts on minority or low income communities. Based on the results of the NTP DEIS, no such impacts are anticipated. The project area encompasses a large geographic region within which are the reservations of three culturally distinct American Indian groups (Navajo, Hopi, and Hualapai), as well as a fourth Federally recognized tribe that does not have reservation land designated for it (San Juan Southern Paiute). In order to encourage public partnerships and communication with low income and minority populations in the project area, the public involvement program, integrated with the environmental planning process, was designed to be comprehensive and to respect and incorporate the different socio-cultural perspectives into the environmental analysis criteria. The process provided opportunities for public participation in and access to information on health and the environment as it relates to NTP. Serious attention to all public comments enhanced the outcome of the process.

DEIS REVIEW

The DEIS was filed with the U.S. Environmental Protection Agency (EPA) and released to the public in late September 1996. A *Federal Register* notice of the filing was published on October 7, 1996, which initiated the public review period. Approximately 800 copies were distributed to agencies, organizations, and individuals for review and comment during the review period, which ended in mid-December 1996 (about 75 days long).

During the review period, Western conducted public hearings in 44 locations throughout the project area. Western originally had planned hearings in seven locations; however, DPA requested that a hearing be conducted at each of the 36 Navajo chapters crossed by alternative routes. Also, to ensure that the public had the opportunity to understand the project before commenting, Western held an open house before each meeting to review informational displays and discuss the project individually with project personnel. A total of 569 people signed the hearing attendance sheets. Spoken comments were provided by a total of 151 people as documented by the court reporter. Approximately 90 percent of the speakers were American Indian. Interpreters translated native languages for the court reporter. On addition, written comments were submitted on comment forms by 13 people at the hearings. Also during the review period, 20 letters were received from various agencies and the public.

The most common comments recorded were associated with the following:

- Distribution of Project Revenue—Navajo people throughout the project area expressed the desire to have revenues from the project distributed to benefit local areas (Navajo chapters)

- Local Electrical Benefits—Navajo people and others in rural areas expressed the desire and need for electricity

- Health and Safety—concerns were mainly associated with the effects of electric and magnetic fields (EMF) on humans, livestock, and crops

- Public Planning Process—some individuals expressed appreciation for the efforts to involve the public and others indicated they want to be more involved in the planning process

- Right-of-way—concerns related to the desire for adequate compensation to landowners and land users for damages caused by construction of the transmission line, for understanding the process for acquiring right-of-way, and for understanding the allowable uses of the right-of-way once the transmission line is in place

- Employment—numerous individuals expressed interest in potential employment associated with the project

The comments from the public and responses to these comments are published in the FEIS.

In March 1997, the Resources Committee and Economic Development Committee of the Navajo Nation Council passed a resolution selecting the environmentally preferred alternative route to proceed with engineering, design, and other studies for the proposed transmission line. The committees thoroughly considered the results of the intensive environmental studies reported in the DEIS and the public's views expressed during the review of the DEIS. The Resources Committee will submit a recommendation to the Navajo Nation Council for approval, which then will be submitted to the BIA for final approval.

MODIFICATIONS, ADDENDA, AND CORRECTIONS

Modifications

DPA is coordinating with Western to proceed with some of the more detailed plans and studies needed before the transmission line can be constructed. DPA recognizes the risk in proceeding with such plans and studies on the preferred route before the final decision is made. DPA understands that if the final decision on a route differs from the preferred route, DPA is responsible for revising the plans and studies accordingly. Potential modifications to the project resulting from detailed mitigation plans, right-of-way acquisition, and engineering design would be evaluated in accordance with NEPA and tiered to the NTP EIS, as appropriate.

To date, there has been one modification. In response to comments received from local land users, a segment of the preferred route between Dennehotso and Black Mesa was analyzed and then realigned. The realignment is addressed in Chapter 2 of this FEIS.

Addenda

In this section of Chapter 2, information is added to the EIS that was not included in the DEIS. The information includes a (1) floodplains and wetlands statement of findings, (2) statement regarding the potential for increased coal-generation and corresponding emissions, (3) change in status of the El Dorado Desert Tortoise Critical Habitat, (4) change in status of the Bennett Freeze area, and (5) disclosure statement for the consultant assisting Western in preparing the EIS.

Corrections

A number of minor corrections to the DEIS are noted in Chapter 2 of this FEIS.

DECISIONS TO BE MADE

Following the publication of the FEIS, Western, in cooperation with DPA and the Navajo Nation, will make a decision regarding NTP. Western's Administrator will issue a Record of Decision, which will (1) state what the decision is, (2) identify all alternatives considered in reaching the decision, and (3) state whether all practical means to avoid or minimize impacts from the alternative selected have been adopted, and if not, why. The Administrator will ensure that the decision is executed as stipulated.

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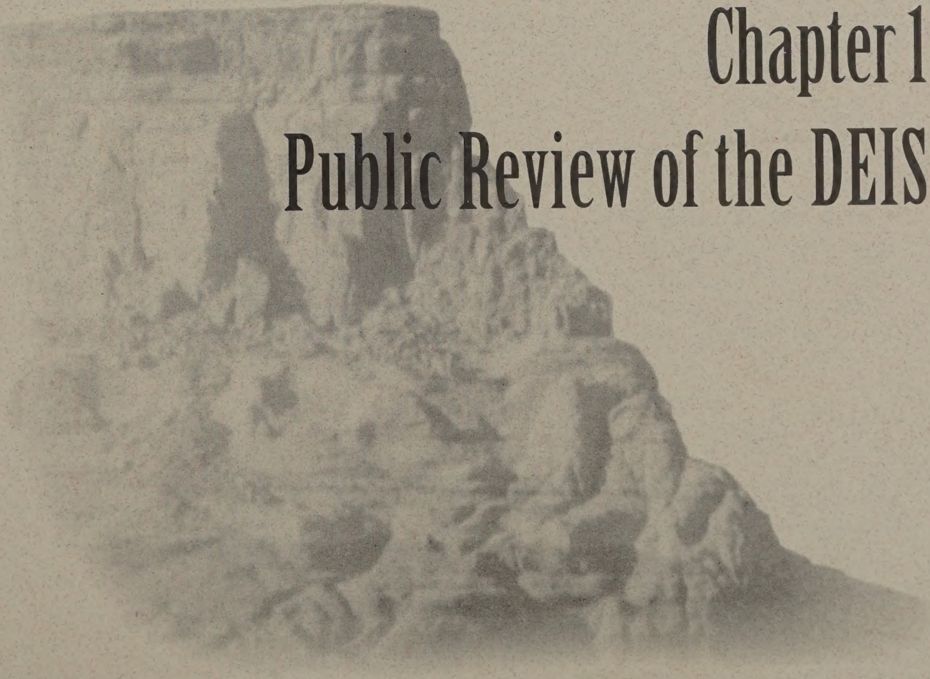


Chapter 1

Public Review of the DEIS

CHAPTER 1—PUBLIC REVIEW OF THE DEIS

Public comments on the DEIS were solicited from agencies, organizations, and individuals and were received in the form of remarks at public hearings and letters. This chapter provides a summary of the public review process and results of the comment analysis.

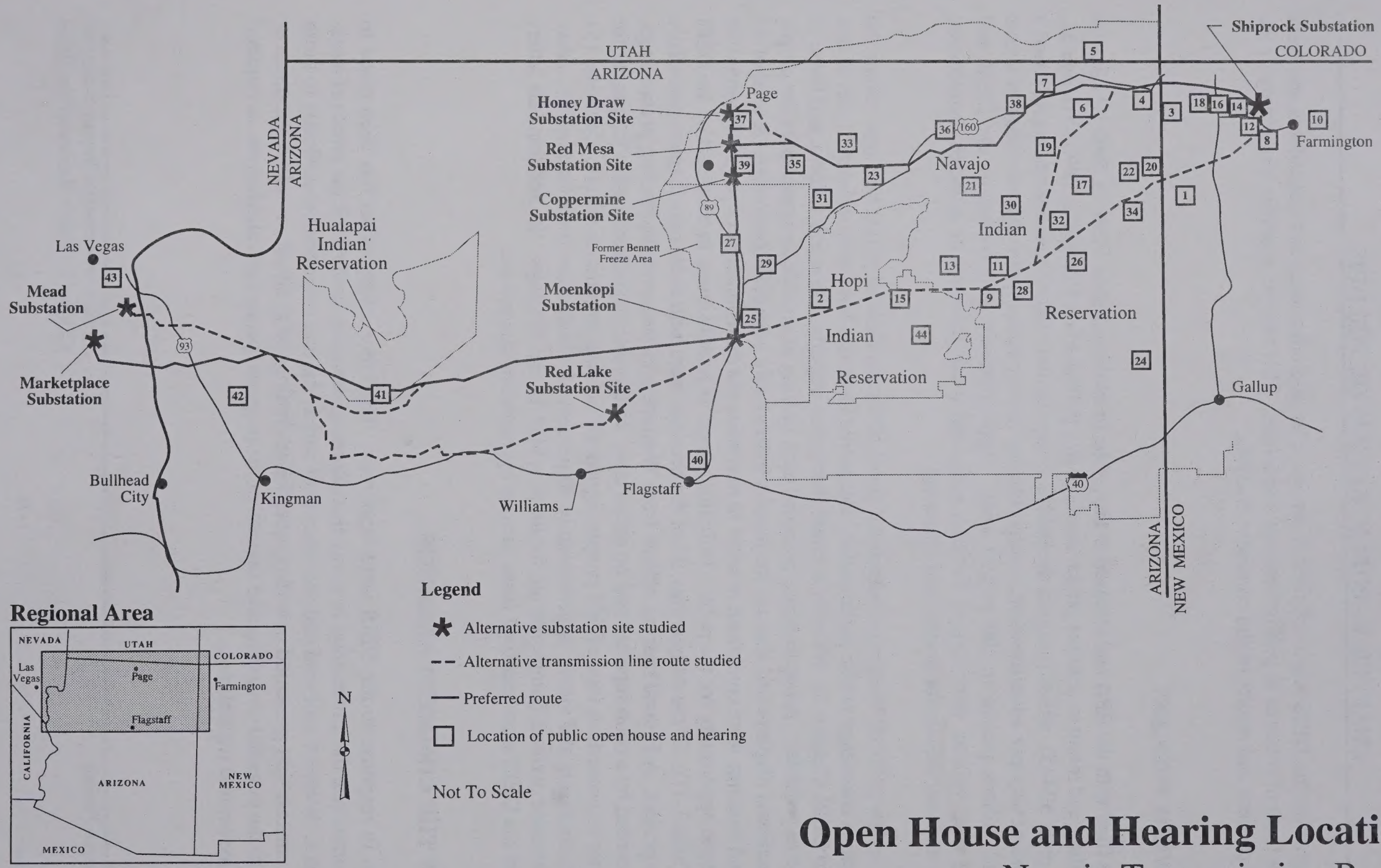
PUBLIC REVIEW PROCESS

The DEIS was filed with the EPA and released to the public in late September 1996. A *Federal Register* notice of the filing and intent to conduct public hearings was published on October 7, 1996 (Volume 61, Number 195, page 52445), which initiated the public review period. Other announcements included a newsletter, paid newspaper advertisement, media releases (newspapers, radio and television in native language), and notices posted in the project area. Approximately 800 copies of the DEIS and accompanying map volume were sent to Federal, state, and local government agencies, institutions, organizations, and individuals for review and comment.

As part of the review process, Western conducted a series of formal Federal public hearings. Since the Federal regulations encourage public participation, and public input has been such an integral part of this project (refer to DEIS, Chapter 5), Western decided that it was important to reach, inform, and listen to as many people as possible. An open house preceded each hearing to provide an opportunity for people to view informational displays and discuss the project individually with NTP personnel. A total of 44 open houses and hearings were conducted in order to maximize the dissemination of project information and provide ample opportunity for the public, including people in remote areas, to comment on the DEIS (Figure 1-1f, Table 1-1f). Of the 44 hearings, 37 of the hearings were held at Navajo chapters potentially affected by the project. A Federal hearing officer from Western presided over the hearing proceedings, which were recorded by a court reporter and on audio tape. Interpreters translated native languages for the court reporter as needed. A total of 569 people signed the hearing attendance sheets. Of those, 151 provided their comments and views, approximately 90 percent of which were American Indian. Also, 13 people submitted written comments on forms provided at the hearings. In addition, 20 letters commenting on the DEIS were received from various agencies and the public.

RESULTS OF THE COMMENT ANALYSIS

The comments in response to the DEIS were numerous. Therefore, every effort has been made to organize and summarize the information in a way that allows reviewers to understand the principal issues of public concern. Western analyzed and considered all comments and responded specifically to those substantive comments that presented new data, questioned findings of analyses, or raised questions or issues relevant to the potential environmental impacts of the proposed project and alternatives, as required by NEPA and associated regulations.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ARIZONA
COLORADO
NEVADA
ARIZONA
ARIZONA
NEW MEXICO
Shiprock Substation
Honey Draw Substation Site
Red Mesa Substation Site
Coppermine Substation Site
Former Bennett Freeze Area
Moenkopi Substation
Red Lake Substation Site
Mead Substation
Marketplace Substation
Las Vegas
Hualapai Indian Reservation
Page
Farmington
Navajo Indian Reservation
Hopi Indian Reservation
Gallup
Bullhead City
Kingman
Williams
Flagstaff
89
93
160
40
1
2
3
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43
44
Legend
Alternative substation site studied
Alternative transmission line route studied
Preferred route
Location of public open house and hearing
Not To Scale
N
Regional Area
NEVADA
UTAH
COLORADO
Las Vegas
Page
Farmington
Flagstaff
CALIFORNIA
ARIZONA
NEW MEXICO
MEXICO

Open House and Hearing Locations

Navajo Transmission Project

Figure 1-1f

TABLE 1-1f
OPEN HOUSES AND HEARINGS

Map Key Number*	Location	Date	Attendance*[1]	Number of Speakers
1	Sanostee Chapter, NM	Oct. 7, 1996	12	5
2	Coalmine Mesa Chapter, AZ	Oct. 7, 1996	9	2
3	Beclabito Chapter, NM	Oct. 7, 1996	19	1
4	Teec Nos Pos Chapter, AZ	Oct. 8, 1996	6	2
5	Red Mesa Chapter, UT	Oct. 8, 1996	32	2
6	Sweet Water Chapter, AZ	Oct. 10, 1996	6	0
7	Mexican Water Chapter, AZ	Oct. 10, 1996	3	0
8	Nenahnezad Chapter, NM	Oct. 14, 1996	4	0
9	Whippoorwill Chapter, AZ	Oct. 14, 1996	10	2
10	Farmington Civic Center, NM	Oct. 14, 1996	9	2
11	TaChee/Blue Gap Chapter, AZ	Oct. 14, 1996	10	3
12	San Juan Chapter, NM	Oct. 15, 1996	6	5
13	Pinon Chapter, AZ	Oct. 15, 1996	3	0
14	Hogback Chapter, NM	Oct. 15, 1996	20	9
15	Hard Rock Chapter, AZ	Oct. 15, 1996	20	8
16	Shiprock Chapter, NM	Oct. 16, 1996	11	3
17	Round Rock Chapter, AZ	Oct. 16, 1996	5	0
18	Cudeii Chapter, NM	Oct. 16, 1996	10	2
19	Rock Point Chapter, AZ	Oct. 16, 1996	19	1
20	Red Valley Chapter, AZ	Oct. 17, 1996	12	6
21	Chilchinbeto Chapter, AZ	Oct. 17, 1996	23	4
22	Cove Chapter, AZ	Oct. 17, 1996	6	3
23	Shonto Chapter, AZ	Oct. 17, 1996	17	4
24	St. Michaels Chapter, AZ	Oct. 21, 1996	5	1

TABLE 1-1f
OPEN HOUSES AND HEARINGS

Map Key Number*	Location	Date	Attendance*[1]	Number of Speakers
25	Cameron Chapter, AZ	Oct. 21, 1996	8	4
26	Chinle Chapter, AZ	Oct. 21, 1996	6	2
27	Bodaway Chapter, AZ	Oct. 21, 1996	12	4
28	Tselani-Cottonwood Springs Chapter, AZ	Oct. 22, 1996	3	0
29	Tuba City Chapter, AZ	Oct. 22, 1996	14	4
30	Rough Rock Chapter, AZ	Oct. 22, 1996	20	1
31	Tonalea Chapter, AZ	Oct. 22, 1996	19	7
32	Many Farms Chapter, AZ	Oct. 23, 1996	6	0
33	Inscription House Chapter, AZ	Oct. 23, 1996	17	10
34	Lukachukai Chapter, AZ	Oct. 23, 1996	20	16
35	Kaibito Chapter, AZ	Oct. 23, 1996	32	9
36	Kayenta Chapter, AZ	Oct. 24, 1996	22	2
37	LeChee Chapter, AZ	Oct. 24, 1996	3	1
38	Dennehotso Chapter, AZ	Oct. 24, 1996	25	6
39	Coppermine Chapter, AZ	Oct. 24, 1996	4	0
40	Flagstaff, AZ	Oct. 29, 1996	15	3
41	Peach Springs, AZ	Oct. 29, 1996	18	3
42	Dolan Springs, AZ	Oct. 30, 1996	9	2
43	Boulder City, NV	Oct. 30, 1996	8	1
44	Kykotsmovi, AZ	Jan. 7, 1996	31	11
	Total		569	151

*Number in this column corresponds to number on Figure 1-1f showing location.
*[1]Number in this column reflects the individuals who signed the attendance list.

Public Hearing Comments The comments from the public hearings have been summarized individually from the hearing transcripts and from comment forms. These comments are summarized and presented along with responses to those comments in Appendices A and B respectively. The predominant issues identified from the public hearings comments are summarized below followed by responses to those issues.

Written Comments Letters received from agencies, organizations, and individuals generally contain specific comments and are responded to individually. The letters are reproduced in full and are presented in Table 1-3f at the end of this chapter.

Issues Identified from the Public Hearings

Of the comments made during the public hearings, the majority pertained to six issues. The six issues and corresponding relative degree of concern, expressed as percentages, are listed in Table 1-2f below.

TABLE 1-2F
COMMON ISSUES AND RELATIVE DEGREE OF CONCERN

Issue	Relative Degree of Concern*
Issue 1—Distribution of project revenues	38%
Issue 2—Local electrical benefits	29%
Issue 3—Health and safety	27%
Issue 4—Public planning process	20%
Issue 5—Right-of-way	15%
Issue 6—Employment	10%

* Percentage of individuals expressing each issue reflects the approximate degree of concern only among the speakers and individuals who provided written comments at the public hearings.

These issues have recurred throughout the project—most predominantly during scoping in 1993 and public meetings in 1995. Recognized as important concerns to the public, these issues were addressed in the DEIS to the extent practicable at the time. What follows is a summary of each of the six issues most commonly expressed during the public review of the DEIS.

Issue 1—Distribution of Project Revenues

Overall, the issue of revenues from the operation of NTP represented the most frequently discussed topic at the public hearings (approximately 38 percent), and was limited to hearings conducted on the Navajo and Hopi reservations. It should be noted that to some people it appears that the phrase "distribution of revenue" is synonymous with "compensation to land users" (aside from compensation for right-of-way or damages). The desire for DPA to direct funds to local communities was particularly strong on the Navajo Reservation, with the majority of people urging that revenues be distributed to local chapters. People stated that distribution of revenue at this level would benefit the chapter members potentially affected by the proposed line. Revenues would be used by the chapters to enhance local educational programs (e.g., scholarships), housing, economic development, and electrical distribution facilities (e.g., substations). They believe that revenues deposited into the Navajo Nation General Fund may not directly benefit those in the chapters. Several individuals inquired if compensation and/or payments received for the development of NTP would be in one lump payment as opposed to periodic payments over time (e.g., annual). Other comments regarding revenues included people believing that those living off the reservations (e.g., non-American Indians) would receive most or all of the monetary benefits associated with NTP and the amount of revenues that could be expected from the proposed line.

Issue 2—Local Electrical Benefits

Overall, this issue was the second most commonly discussed topic at the public hearings (nearly 29 percent of the commentors). More specifically, because more than 60 percent of residents on the Navajo Reservation do not have electricity, a number of comments urged that the proposed transmission line provide electricity locally. Many individuals want the purpose of the project modified to include a provision or stipulation for the distribution of electricity to local communities. Several commentors from areas throughout the Navajo Reservation urged that a substation be constructed and operated locally allowing the power to be transformed, or stepped down, for use in residences and businesses. Some people explained that lack of local electrical service is precluding economic development, particularly on the Navajo Reservation.

Also, many individuals were unclear about the differing roles of DPA and NTUA, and most do not understand the technical and/or financial requirements to distribute electricity locally from an extra-high-voltage power source. Others do not understand the explanation that if Western participates in the project, NTP would allow Western an alternate path for firm-power deliveries, reducing dependence and freeing capacity on Western's Shiprock-Kayenta-Long House Valley-Glen Canyon 230kV transmission path for delivery of electricity to Kayenta and Long House Valley substations—providing NTUA more flexibility to plan additional distribution in the areas serviced by those substations.

There was a common concern raised by many individuals regarding the use of American Indian reservation lands and resources (e.g., coal) for the development of electrical benefits for people living off the reservation; this issue was raised at various locations in the project area but was most evident on the Navajo Reservation. More infrequent comments regarding local electrical benefits included the suggestion that the proximity of NTP to residences would be a factor in receiving local distribution (some suggested that people, particularly those on reservation lands, are moving closer to existing transmission lines in hopes that they can receive electricity from the lines); the disbelief that people would receive electrical service from NTP based on experiences with previously developed transmission lines (some people stated that promises made by proponents of existing lines with regards to local electrical distribution were not kept); indications by a few people that they would rather receive local electrical service than compensation for right-of-way; and others stated that revenues generated by NTP should be used to develop local distribution facilities (e.g., substations, distribution lines).

Issue 3—Health and Safety

Nearly 27 percent of the people who spoke or submitted written comments at the hearings made reference to potential effects of the proposed transmission line on health and safety. Comments focused primarily on EMF effects and a prevalent perception among commentors that the fields (often referred to as "emissions" or "radiation") associated with transmission lines cause cancer and other adverse health effects in humans (livestock, wildlife, and crops also were mentioned). Additionally, some people inquired about the effects of the fields on pacemakers and one person inquired about the effects on metallic joints.

Numerous individuals expressed concern about nuisances and/or hazards associated with transmission lines. Specifically, some individuals indicated that, during inclement weather (e.g., rain, snow), they can feel the fields being emitted from existing lines. A few people questioned the structural integrity of transmission lines when the lines are subjected to severe weather conditions such as thunderstorms and tornadoes. Also, shocks from metallic objects in proximity to transmission lines were mentioned.

Several people urged that the project proponent(s) seriously consider health and safety, and that the project should be developed in a manner that reduces potential health and safety effects.

Issue 4—Public Planning Process

Overall, approximately 20 percent of the people raised the issue of involving and incorporating the concerns of landowners and land users in the decision-making process and the importance of keeping people informed of the project throughout the planning stages. There were several people throughout the Navajo Reservation who suggested that the project was approved prior to the public hearings and as a result would not reflect their input and concerns. Additionally, some comments were made urging that information be provided to people informing them of the health and safety related issues associated with the project. A few people also explained that some misunderstandings about the project may have resulted from the lack of technical words in native languages made it difficult to effectively translate the technical aspects of the purpose and need of NTP to the people on the American Indian reservations. A number of people mentioned that there was not enough notification for the public hearings. Finally, several people appreciatively acknowledged the proponents' effort to inform and involve people in the project as some stated that previously developed transmission lines included no such effort.

Issue 5—Right-of-way

Comments regarding right-of-way were raised by approximately 15 percent of the total number of commentors and can generally be summarized as (1) requests or demands for compensation for damages, (2) compensation for removing the land from use, and (3) the amount of compensation to be provided. Issues related to right-of-way compensation were raised throughout the project area but were particularly evident at the hearings conducted on the Navajo and Hualapai reservations. In reviewing the comments received on this issue it is apparent that most of the individuals understood that they would be compensated for damages resulting from construction. However, despite individuals' expectations of being compensated for right-of-way damages, several speakers questioned whether or not compensation would ever be realized—this apparently stems from past experiences. Specifically, many individuals, particularly those on the Navajo Reservation, explained that they had not been compensated monetarily for the development of transmission lines.

Many individuals also stated that compensation would be required given that the amount of right-of-way needed for the proposed project would result in the disruption and/or removal of current land use activities. More specifically, several individuals questioned how the amount of compensation due to landowners and land users would be determined. Additionally, several speakers suggested that compensation be provided on a periodic basis (e.g., biannually) as opposed to a lump-sum payment. Some individuals inquired about the process for acquisition. A few individuals believed that the right of eminent domain would be imposed where people refused to grant right-of-way across their lands. Finally, some speakers inquired if relocation assistance would be provided by proponents of NTP, as a few individuals stated that no such service had been provided when existing transmission lines were developed. Speakers commonly questioned what uses (e.g., grazing and agriculture) would be permitted within the right-of-way.

Issue 6—Employment

Nearly 10 percent of the people raised the issue of employment. In general, a number of people, particularly those on the Navajo Reservation, felt that the proposed project would and/or should provide opportunities for employment. In addition to inquiring about the number of jobs associated with NTP, several people questioned whether or not opportunities would exist for American Indians. Numerous people stated the need for long-term employment opportunities, explaining that there is currently a lack of such jobs on the Navajo Reservation and that past projects did not provide such opportunities. One individual stated the need to negotiate terms for employment of Navajo people early in the planning phase in an attempt to ensure long-term employment opportunities. Finally, one speaker inquired whether unions or the Navajo Nation would oversee employment practices.

Other Issues

In addition to the six issues described above, there were several less frequently raised issues. For example, a few speakers expressed concern that the proposed line could potentially affect and degrade water resources. Also, several speakers throughout the Navajo Nation expressed concern that constructing NTP through the Hopi Reservation would ultimately result in the loss of benefits to the Navajo Nation. Generally, people apparently believe that the long-standing land dispute (Bennett Freeze) would further precipitate disputes between the Navajo and Hopi Tribes regarding ownership of NTP and, hence, the receiving of benefits (e.g., revenues). Also, several people in attendance at the Hogback Chapter public hearing voiced concern regarding the unauthorized use of existing access roads. For instance, one speaker indicated that people are using existing access roads illicitly, while other speakers attribute the lack of access road monitoring to the vandalizing of homes and private property.

Some people, particularly those on the Navajo Reservation, expressed concerns regarding the visual and audible (corona) effects produced by existing transmission lines during inclement weather. Additionally, and particularly evident on the Navajo and Hopi reservations, people expressed the importance of considering the sensitivity of culturally significant places. Some people also expressed concern regarding impacts on views, with a particular concern for how the addition of NTP would impact views from residences. A few people throughout the project area also suggested that the feasibility of adding lines to existing towers be considered as a means to avoid further land disturbance. Finally, numerous people on the Navajo Reservation inquired about how the addition of NTP would affect local electricity rates.

RESPONSES TO COMMENTS

The following sections are responses to the six predominant issues identified from the public hearings. Responses to each comment reflecting these and other issues are presented in Tables A-2f and B-2f.

Response to Issue 1—Distribution of Project Revenue

As explained in the DEIS on pages S-2 to S-3, S-12, 1-1 to 1-2, 1-4 to 1-7, and 4-26 to 4-34, NTP is an opportunity for the Navajo Nation to own and operate a transmission line that would be an integral part of a regional transmission system in the western United States, thereby establishing a role in the electric utility industry. Revenue associated with the project would be produced by leasing the capacity of the transmission line to regional utilities.

Annual revenues generated over the life of the project would provide funds to allow the Navajo Nation to improve its economic condition and allow for investment in other long-range productive business opportunities. The amount of revenue produced by NTP would depend on final percent of ownership, right-of-way costs, lease agreements, operation and maintenance costs, and availability of capacity. Moreover, NTP is expected to contribute to an increase in the income and standard of living for the

Navajo Nation. However, amounts of revenue over time and distribution of funds cannot be determined at this time.

Response to Issue 2—Local Electrical Benefits

As explained in the DEIS, pages S-2 and 1-1 to 1-7, the purpose of NTP is to relieve constraints on the transmission of bulk power west from the Four Corners area to customers in the southwestern United States. However, the addition of NTP could free up capacity on Western's 230kV Shiprock-Kayenta-Long House Valley-Glen Canyon transmission path. This would allow increased deliveries of electricity to the Kayenta and Long House Valley substations providing NTUA with the increased ability to plan for additional local distribution. The DEIS goes on to say, however, that a source of high-voltage transmission is still needed to meet present and future needs of NTUA and the Navajo Nation.

As NTP is planned at present, the issue of distribution of electricity for local residential and business use in several locations along the transmission line is beyond the scope of this EIS. Technically, it would be possible to build substations along the NTP 500kV transmission line for the purpose of supplying power to local areas. However, it would be very costly and jeopardize the reliability of the transmission line. An intermittent substation used to reduce the voltage from 500kV to 12kV, the voltage used by most end users, typically would require (1) two or three transformers to reduce the voltage from 500kV to 230kV, 230kV to 69kV, and 69kV to 12kV; (2) circuit breakers; (3) switches; and (4) miscellaneous equipment. The estimated cost would be in excess of $7 million for each substation. In addition, a substation, or substations, along a transmission line would be a weak link. In the event of substation equipment failures, the transmission line could be rendered inoperable, thereby decreasing the reliability of the transmission line and the system of which it would be an integral part.

Response to Issue 3—Health and Safety

The concerns expressed regarding EMF effects are addressed in the DEIS, pages 4-48 through 4-56. The topic of electric fields and human health is addressed on pages 4-54 through 4-55; potential effect on pacemakers is addressed on page 4-54. The topic of magnetic fields and human health is addressed on pages 4-55. Effects on agriculture and wildlife are addressed on pages 4-55 and 4-56. Audible noise from the transmission line during operation is addressed on page 4-48. Safety and hazards are addressed on pages 2-32, 2-33, 4-50, and 4-56.

Since the NTP DEIS was issued, the National Academy of Sciences published the findings of a study regarding the *Possible Health Effects of Exposure to Residential Electric and Magnetic Fields* (1997, National Academy Press). Public concern regarding possible adverse health effects from exposure to EMF produced by power transmission lines and the use of electrical appliances has resulted in considerable debate among scientists and the public. The U.S. Congress asked the National Academy of Sciences to review the research literature on the effects from exposure to these fields and determine whether the scientific basis was sufficient to assess health risks from such exposures. In response to the legislation directing DOE to enter into an agreement with the National Academy of Sciences (Public Law 102-104), the National Research Council convened a committee comprised of experts in cancer, reproductive and developmental effects, and neurobiological effects to review and evaluate the research literature on the possible health effects of exposure to EMF. The report is the result of nearly three years of study and deliberations. The comprehensive evaluation of published studies relating to the effects of EMF on cells, tissues, and organisms resulted in the conclusion that "the current body of evidence does not show that exposure to these fields presents a human-health hazard. Specifically, no conclusive and consistent evidence shows that exposures to electric and magnetic fields produce cancer, adverse neurobehavioral effects, or reproductive and developmental effects."

Although conclusive results are not yet known, DPA and Western have acted prudently in response to health and safety concerns. For example, the proposed transmission line has been sited through areas of low population densities to reduce potential for exposure, and information on health and safety has been communicated openly and honestly to the public.

Response to Issue 4—Public Planning Process

As explained in the DEIS, pages S-14 to S-15, 5-1 to 5-12, A-2, and A-10, public participation is an integral part of the environmental process. The magnitude of NTP requires that information about the project reach and be understood by people residing throughout the project area in order for it to be accepted. Consequently, the public has had the opportunity to access project information and provide input throughout the planning process, including, among other things, 17 public scoping meetings during August and October 1993, 20 public meetings during June 1995, and 44 public hearings for comment on the DEIS, 37 of which were held on the Navajo Reservation (refer to Figure 1-1f for locations of hearings). The objectives of the meetings and hearings were to inform the public of the possible effects on the natural, human, and cultural environment; accurately identify and consider the issues and concerns of the public; and ensure that public input is integrated into the overall decision-making process.

Additional information and announcements for the meetings/hearings were advertised through the use of letters, a series of seven newsletters, media releases, and four notices (500 11-inch by 17-inch each time) posted on and off the Navajo Reservation. All comments and questions at the public meetings were recorded and summarized. Verbal comments provided at the public hearings were documented by a court reporter. In addition to verbal comments, written comments on the DEIS were compiled, analyzed, summarized, and ultimately responded to in the FEIS.

Access to information was provided through the development of a public involvement program that was designed to be comprehensive, and to respect and incorporate the different socio-cultural perspectives. This included (1) holding numerous meetings in remote areas (e.g., DPA presentations at Navajo chapter and grazing committee meetings), (2) interpreting radio announcements and meeting presentations into local native languages, (3) involving appropriate tribal agencies in the environmental studies, (4) ensuring that visual displays were designed to consider the cultural differences of audiences, and (5) distributing informational materials throughout the planning process.

Response to Issue 5— Right-of-Way

As explained in the DEIS on pages 2-15 to 2-18, new or additional land rights would be needed to accommodate NTP, including the transmission lines, access roads, and substations. The transmission line right-of-way would require a width of 250 feet. The width of the right-of-way could, to the extent practicable, be reduced in areas where NTP would parallel existing transmission lines. Acquisition of right-of-way across American Indian reservations is administered by numerous authorities, acts of Congress, and treaties. Approval of right-of-way acquisition rests with the Secretary of the Department of the Interior through the BIA with contemporaneous consent of the affected tribe. The DEIS explains that right-of-way on American Indian reservation lands would be acquired by DPA and the Navajo Nation. Tribal approval of the right-of-way would be evidenced by a resolution approved by the respective tribe or, where applicable, written consent from allottees. *At this time, specific information regarding right-of-way acquisition is not available, but should be available before the FEIS is issued to the public.*

Response to Issue 6—Employment

As explained in the DEIS, pages S-12, 2-29 to 2-32, and 4-31, the total work force required to complete construction of NTP would be approximately 225 people, 50 percent of which would be hired locally (including American Indians). The percentage of locally hired workers would be dependent on skills and manpower requirements. Refer to Table 2-5 in the DEIS for personnel and equipment needed for construction of NTP, substation, and communication facility. Also, work force requirements during construction are illustrated in Figure 2-8. The majority of the jobs associated with NTP would be short term, with fewer long-term opportunities. It is anticipated that hiring of construction of workers would comply with the Tribal Employment Rights Ordinance and other tribal preference employment acts, as appropriate. Moreover, the intent of NTP is to be one of many projects developed to provide future economic stability for the Navajo Nation as a whole.

Responses to Other Issues

As mentioned above, responses to other issues raised are presented in Tables A-2f and B-2f.

WRITTEN COMMENTS AND AGENCY RESPONSES

The individuals who provided written comments on the DEIS are listed in Table 1-3f. Table 1-4f contains a copy of each letter. The letter is reproduced on the left side of the page with each comment delineated. The responses to the comments are on the right side of the page.

TABLE 1-3f
LIST OF PARTIES WHO PROVIDED WRITTEN COMMENTS

Letter Number	Commenter	Representing
1	Mary Kay Peck, AICP, Planning Director	City of Henderson
2	Earl Havatone, Chairman	Hualapai Tribal Council
3	Gedi Cibas, PhD Environmental Impact Review, Coordinator	State of New Mexico Environment Department
4	Theron H. Goynes, Chairman	Clark County A-95 Clearinghouse Council
5	T. Adams	Self
6	H. Deon Murphy, P.E. Electrical Engineer	U.S. Department of Interior Bureau of Reclamation
7	Terri Rodefer Environmental Advocate	State of Nevada Department of Administration Nevada State Clearinghouse
7a	David R. Cowperthwaite Clearinghouse Coordinator	State of Nevada Dept of Conservation and Natural Resources Division of Environmental Protection
7b	Edward W. Bittleston, Land Agent	State of Nevada Dept of Conservation and Natural Resources Division of Lands
8	James Rindone	Arizona Department of Transportation Intermodal Transportation Division Environmental Planning Section
9	Jeff Harris Planning Manager	Clark County, Nevada Department of Comprehensive Planning
10	Robert S. Lynch Assistant Secretary-Treasurer	Irrigation & Electrical Districts Association of Arizona
11	Eric Blank, Director LAW Fund Energy Project	Land and Water Fund
12	Charles S. Watson, Jr. Executive Director	Nevada Outdoor Recreation Ass'n, Inc. National Public Lands Task Force
13	Ron Christofferson Project Evaluation Coordinator	Arizona Game & Fish Department Habitat Branch

TABLE 1-3f
LIST OF PARTIES WHO PROVIDED WRITTEN COMMENTS

Letter Number	Commenter	Representing
14	David Farrel, Chief	U.S. Environmental Protection Agency, Region IX Federal Activities Office
15	Michael A. Ferguson Deputy State Director Resources Division	U.S. Department of Interior Bureau of Land Management Arizona State Office
15a	Rebecca Peck, Wildlife Biologist Bruce Asbjorn, Wilderness Specialist John Thompson, Geologist	Kingman Field Office, AZ Kingman Field Office, AZ Kingman Field Office, AZ
15b	Joel E. Farrell, Assistant District Manager	Farmington District Office, NM
16	Charles E. Martin, P.E., R.L.S.	Marco Contracting , Inc. for Mohave County Public Land Use Committee
17	Terri Rodefer Environmental Advocate	State of Nevada Department of Administration Nevada State Clearinghouse
17a	Ann P. Wilkinson Assistant General Counsel	Public Service Commission of Nevada
18	Roger S. Peterson	Rio Grande Chapter of the Sierra Club
19	Ann V. Howard Public Archaeology Programs Manager/Archaeologist	Arizona State Parks State Historic Preservation Office
20	Stanley T. Albright Field Director, Pacific West Area	U.S. Department of the Interior National Park Service Pacific West Field Area Pacific Great Basin System Support Office

1

TABLE 1-4F
WRITTEN COMMENTS AND AGENCY RESPONSES

October 15, 1996

Mr. Tony Morton, EIS Manager
Western Area Power Administration
CRSP CSC
257 East 200 South, Suite 475
P.O. Box 11606
Salt Lake City, Utah 84147-0606

RE: Navajo Transmission Project Draft Environmental Impact Statement (DEIS)

Dear Mr. Morton:

A Thank you for the opportunity to review the Draft Environmental Impact Statement for the Navajo Transmission Project. After careful review of the document and accompanying maps, the project does not appear to have any direct impact on the City of Henderson. Therefore, the City of Henderson does not have any comments on the DEIS.

Sincerely,

Mary Kay Peck

Mary Kay Peck AICP
Planning Director

MKP/SLG

cc: Bristol S. Ellington, Assistant Planning Director
Susan Gray, Principal Planner

CITY HALL • 240 WATER STREET • HENDERSON, NV • 89015
702-565-2323

A No response is needed

2

The Great Spirit created Man and Woman in his own image. In doing so, both were created as equals. Both depending on each other in order to survive. Great respect was shown for each other; in doing so, happiness and contentment was achieved then, as it should be now.

The connecting of the Hair makes them one person; for happiness or contentment cannot be achieved without each other.

The Canyons are represented by the purples in the middle ground, where the people were created. These canyons are Sacred, and should be so treated at all times.

The Reservation is pictured to represent the land that is ours, treat it well.

1883

The Reservation is our heritage and the heritage of our children yet unborn. Be good to our land and it will continue to be good to us.

The Sun is the symbol of life, without it nothing is possible – plants don't grow – there will be no life – nothing. The Sun also represents the dawn of the Hualapai people. Through hard work, determination and education, everything is possible and we are assured bigger and brighter days ahead.

The Tracks in the middle represent the coyote and other animals which were here before us.

The Green around the symbol are pine trees, representing our name Hualapai – PEOPLE OF THE TALL PINES –

HUALAPAI NATION
OFFICE OF THE CHAIRMAN
P.O. Box 179 • Peach Springs, Arizona 86434 • (520) 769-2216

Earl Havatone
Chairman

Edgar B. Walema
Vice Chairman

October 30, 1996

Mr. Anthony G. Morton, NTP-EIS Manager
Western Area Power Administration
P.O. Box 11606
Salt Lake City, UT 84147-0606

Dear Mr. Morton:

The Hualapai Tribe has reviewed the Draft Environmental Impact Statement for the Navajo Transmission Project (DEIS-NTP) and as a Cooperating Agency in the DEIS-NTP have the following written comments for the record:

A 1) Alternative Routes N4, S4, N2 and S2 to the south of the Hualapai Indian Reservation have high sensitivity and impact on Hualapai Traditional Cultural Places.

B 2) Alternative Routes N4, S4, N2 and S2 to the south of the Hualapai Indian Reservation have moderate sensitivity and impact on Archaeological Sites.

C 3) We are still not comfortable with the amount of information known or available concerning Electric and Magnetic Fields (EMF). Although final and conclusive results on the health impacts of EMF are not yet known, we are asked to consider Alternative Route N3 in the western area as the environmentally preferred route. This route crosses our reservation and therefore might have health impacts on our people.

A The DEIS incorporates the results of a study conducted by the Hualapai Cultural Preservation Office, which is consistent with the comment.

B The DEIS indicates that there are some areas of projected moderate impacts on archaeological and historical sites in areas to the south of the Hualapai Reservation.

C Refer to the response to Issue 3 in Chapter 1.

2 (continued)

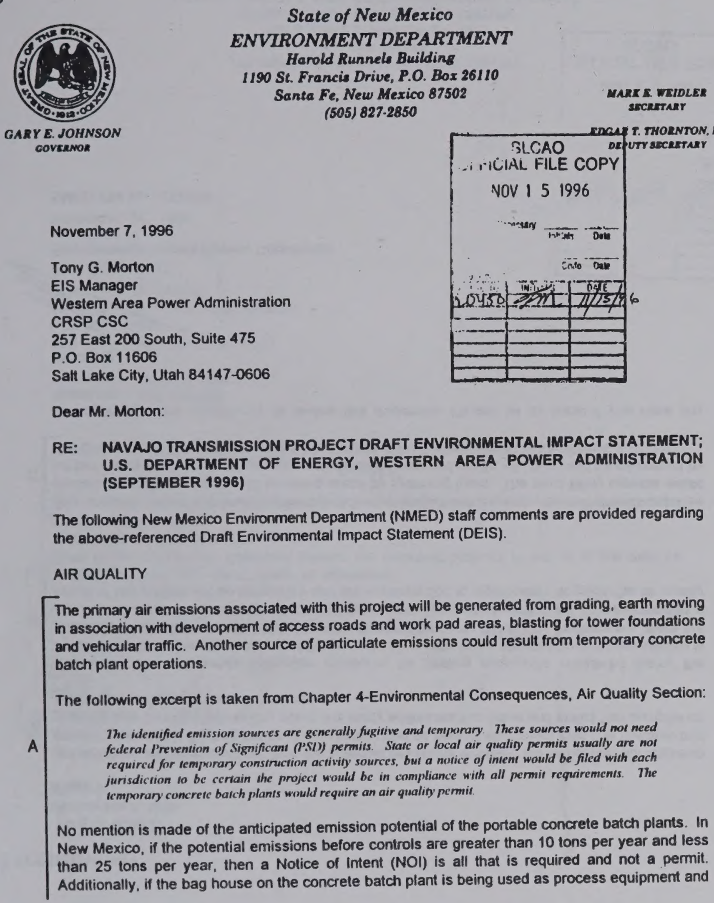
D We appreciate the opportunity to provide comments on the DEIS-NTP. We also feel the document was very well written and look forward to reviewing the final Environmental Impact Statement and providing more comments as necessary.

Sincerely,

Earl Havatone
Earl Havatone, Chairman
Hualapai Tribal Council

D Your comment has been noted. Western will provide copies of the FEIS to the Hualapai Tribe for review.

3



State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2850

GARY E. JOHNSON
GOVERNOR

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

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NOV 15 1996
0450 11/15/96

November 7, 1996

Tony G. Morton
EIS Manager
Western Area Power Administration
CRSP CSC
257 East 200 South, Suite 475
P.O. Box 11606
Salt Lake City, Utah 84147-0606

Dear Mr. Morton:

RE: **NAVAJO TRANSMISSION PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT; U.S. DEPARTMENT OF ENERGY, WESTERN AREA POWER ADMINISTRATION (SEPTEMBER 1996)**

The following New Mexico Environment Department (NMED) staff comments are provided regarding the above-referenced Draft Environmental Impact Statement (DEIS).

AIR QUALITY

A

The primary air emissions associated with this project will be generated from grading, earth moving in association with development of access roads and work pad areas, blasting for tower foundations and vehicular traffic. Another source of particulate emissions could result from temporary concrete batch plant operations.

The following excerpt is taken from Chapter 4-Environmental Consequences, Air Quality Section:

> *The identified emission sources are generally fugitive and temporary. These sources would not need federal Prevention of Significant (PSD) permits. State or local air quality permits usually are not required for temporary construction activity sources, but a notice of intent would be filed with each jurisdiction to be certain the project would be in compliance with all permit requirements. The temporary concrete batch plants would require an air quality permit.*

No mention is made of the anticipated emission potential of the portable concrete batch plants. In New Mexico, if the potential emissions before controls are greater than 10 tons per year and less than 25 tons per year, then a Notice of Intent (NOI) is all that is required and not a permit. Additionally, if the bag house on the concrete batch plant is being used as process equipment and

A The statement "The temporary concrete batch plant would require an air quality permit" may be more appropriately stated "The portable concrete batch plant may require an air quality permit." In an effort to reduce the amount of emissions from portable batch plants, materials (e.g., sand, gravel) would be delivered to the portable batch plants in enclosed trailers, any stockpiled materials would be wetted, and the concrete would be mixed in enclosed concrete-mixing trucks. At this stage of the project, not enough design and engineering information has been developed to estimate the emission potential of a portable concrete batch plant. When the permitting processes are underway, requirements for obtaining applicable permits and approval would entail estimating impacts and addressing avoidance, protection, and mitigative measures.

3 (continued)

Tony G. Morton
November 7, 1996
Page 2

A not emission control equipment, then the potential emissions will likely fall within the NOI emission range. However, if the bag house is only being used as control equipment then it is possible that a permit may be required. In any event, the study addresses this issue and states that compliance with all permit requirements will be met.

B The study also addresses mitigation measures for limiting particulate emissions during the construction and operation phases of the project. Air quality in the affected area of New Mexico is in attainment with federal National Ambient Air Quality Standards (NAAQS). Furthermore, there are no Class I areas in or near the affected project area. The emissions that will be generated as a result of the project will be temporary and are not expected to significantly degrade the air quality in this region.

B Your comment has been noted.

SURFACE WATER QUALITY

C Any impacts to surface water resources from the project are expected to be minimal because placement of towers can avoid sensitive areas by spanning them. The most likely impacts would be temporary ones from construction activities and unpaved roads, which should be minimized by use of appropriate best management practices to control erosion and sedimentation.

C Your comment has been noted.

We appreciate the opportunity to review this document. Please let us know if you have any questions.

Sincerely,

Gedi Cibas, Ph.D.
Environmental Impact Review Coordinator

NMED File No. 1033ER

4

CLARK COUNTY A-95 CLEARINGHOUSE COUNCIL
CLARK COUNTY GOVERNMENT CENTER
500 S Grand Central Pky Ste 3012
PO Box 551746
Las Vegas NV 89155-1746 • (702) 455-4181

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NOV 19 1996
Date
Date
10450 11/19/96

November 14, 1996

Department of Energy
Western Area Power Administration
P.O. BOX 11606
Salt Lake City, UT 84147-0606

Attention: Tony G. Morton
EIS Manager

NAVAJO TRANSMISSION PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

A The Clark County Clearinghouse Council, at their November 14, 1996 meeting, accepted the above entitled program.

Based on the information contained therein, the proposed program is not, as of this date, in conflict with area wide plans, goals, or objectives.

We appreciate the opportunity to review this program and look forward to your continued cooperation with the Clark County Clearinghouse Council.

Sincerely,

Theron H. Goynes

THERON H. GOYNES
CHAIRMAN

THG:eb
Attachment

COUNCIL MEMBERS

Councilman Theron H. Goynes, Chairman, North Las Vegas • Mayor Ken Carter, Vice-Chairman, City of Mesquite
Commissioner Myrna Williams, Clark County • Councilman Michael McDonald, Las Vegas
Councilman David Wood, Henderson • Councilwoman Iris Bletsch, Boulder City
Richard B. Holmes, Technical Committee Chairman

A Your comment has been noted. DPA and Western will continue to cooperate with the Clark County Clearinghouse Council.

5

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NOV 25 1996
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NOV 2 5 1996
Initials Date
ROUTE TO INITIALS DATE
L0450 TM 11/26/96

11-21-96
to; Western area Power Adm –
Re; Navajo Transmission Project;

A I did not received document as requested, however was able to borrow one for a short time –

B Is the main rational of this project to get more power to Las Vegas + So California? Is there a possibility of distribution to areas between – Page? Kingman? – ??

C ① Please respect the wishes of our Native peoples – We have used + abused them + their lands too much already –

D ② With people wanting more power for more + more toys – why should the oject to the structure assisting in bringing the power? – The environment needs to be considered when disturbance is necessary – further pollution needs to be avoided – We should be smart enough, by now to do this!!

E ③ Please stay with established right-a-ways as possible – I'm glad you cancelled that northern route!

A A copy of the DEIS was sent to Mr. Adams on November 4, 1996.

B Refer to the response to Issue 2 in Chapter 1.

C Your comment has been noted. As indicated in the DEIS, pages 5-12 and 5-14, extensive coordination with American Indians has taken place and will continue.

D Your comment has been noted. We agree with and appreciate your concern for the environment. As evidenced by the EIS, extensive studies have been conducted to address potential effects on the environment and to minimize those effects using mitigative measures. Additionally, as the project progresses, Western and DPA will consult with the land-managing agencies to address site-specific concerns and minimize potential effects to the extent practicable.

E Your comment has been noted. Where possible, alternative corridors for NTP have been located in, or adjacent to, existing utility corridors as explained on pages S-6 and 3-39 of the DEIS.

5 (continued)

11-21-96

F (A) - If you use the Willow Beach crossing - is there a possibility of Dept of Transportation co-op -?; as this area has been studied as a possible new crossing of the River to avoid Hoover Dam. Maybe save everyone a little money with road building.

G I am not a representive of any established group. I do attend the Public Land Use Committee meetings here in Mohave County. I try to get more people involved in their community by letters & our local "Talk radio". -

H I still would like a copy of the NTP - DEIS - as I had to return the one I borrowed.

thank you

T Adams

F The preferred route avoids the crossing of the Colorado River near Willow Beach. If the alternative route near Willow Beach is proposed for construction, DPA will coordinate with the Arizona Department of Transportation to take advantage of previous studies.

G Your comment has been noted.

H As mentioned above, a copy of the DEIS was sent to Mr. Adams on November 4, 1996.

6

United States Department of the Interior

BUREAU OF RECLAMATION
Lower Colorado Regional Office
P.O. Box 61470
Boulder City, NV 89006-1470

IN REPLY REFER TO
LC-4641
ENV-6.00

NOV 21 1996

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NOV 25 1996

Mr. Tony Morton
EIS Manager
Western Area Power Administration, CRSP CSC
257 East 200 South, Suite 475
P.O. Box 11606
Salt Lake City UT 84147-0606

Subject: Comments Concerning the Navajo Transmission Project, Draft Environmental Impact Statement September 1996, Department of Energy, Western Area Power Administration (Western)

Dear Mr. Morton:

We have the following comments concerning the subject Draft Environmental Impact Statement:

A SUMMARY, Page S-1, INTRODUCTION, first paragraph, last line - The project is stated to operate for 50 years. Is this expected period of operation tied to another event other than useful life? It appears later that this 50-year period may be driven by the rights-of-way being granted by the controlling agent for part of the lands crossed.

B SUMMARY, Page S-3, PURPOSE AND NEED, first paragraph, last four lines - How will the construction of this line ease the capacity restrictions on the 230-kV path to Kayenta and Long House Valley Substations? It may reduce the loading on the line, but the contractual paths and their associated capacities that exist would have to be renegotiated. Thus it may not follow that the capacity being made available will automatically arrive with completion of the proposed line. In addition, have the WSCC studies been conducted to demonstrate that, the construction and operation of, this line will provide the operational unloading of the 230 kV path?

C SUMMARY, Page S-5, ALTERNATIVES INCLUDING THE PROPOSED ACTION, ALTERNATIVES STUDIED IN DETAIL, paragraph five, last line - Again the life of the project is projected to be 50 years. Is this not a lifetime based on the assumption that there is no possibility of renewal of the land use permits and so forth?

A The 50 years refers only to the expected lifespan of the project and does not relate to any of the real estate issues.

B WSCC rating studies have been completed to a sufficient level to demonstrate that the 230kV path between Shiprock and Page can be unloaded. Western and DPA are aware that power contracts would have to be renegotiated and have no reason to believe that those renegotiations would not be successful.

C Again, the 50 years refers only to the expected lifespan of the project and not to any renewal of the grant for right-of-way.

6 (continued)

2

D CHAPTER 2 - ALTERNATIVES INCLUDING THE PROPOSED ACTION, page 2-11, paragraph two, last four lines - When the Intertie Project (Mead-Phoenix 500-kV line) of Western interconnected at Mead Substation, did it not leave any room for future expansion? The need for six additional acres implies a substantial addition, to the existing 500 kV switchyard, would be required at Mead.

E General Comment: We are concerned with the construction of a line, in which Western is a participant, which appears to have no commitments by Western's customers to use the path. The Western capacity on the Mead-Phoenix 500-kV line does not appear to be in use currently. The question has been raised by customers if it is prudent to continue to participate in construction of lines that do not have project related functions, with no apparent customer subscription. How will Western's participation be repaid?

Sincerely,

H. Deon Murphy

H. Deon Murphy, P.E.
Electrical Engineer

D As indicated in the DEIS, pages 2-10 and 2-11, equipment for a 500kV substation would require approximately 60 acres. At Mead Substation, there is room for expansion; however, it has been estimated that six acres of additional space (not already available in the yard) would be needed. The final equipment configuration would determine the exact amount of space needed.

E As stated in the DEIS, page 1-2, "Western may participate and is assisting with preconstruction activities, including serving as the lead Federal agency for compliance with the National Environmental Policy Act of 1969 (NEPA)." At this time, NTP remains a proposal of DPA, and Western has made no commitment to participate. Western will communicate with our customers regarding our potential participation in the project when the time is appropriate to make that decision.

7

NOV 2 9 1996

BOB MILLER
Governor

STATE OF NEVADA

JOHN P. COMEAUX
Director

DEPARTMENT OF ADMINISTRATION
Capitol Complex
Carson City, Nevada 89710
Fax (702) 687-3983
(702) 687-4065

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November 26, 1996

Anthony G. Morton
Western Area Power Administration
Colorado River Storage Project
Customer Service Center
P.O. Box 11606
Salt Lake City, UT 84147-0606

Re: SAI NV # E1997-038 Project: DEIS -- Navajo Transmission Project

Dear Morton:

A Enclosed are the comments from the Nevada Division of Environmental Protection and the Division of State Lands concerning the above referenced project. These comments constitute the State Clearinghouse review of this proposal as per Executive Order 12372. Please address these comments or concerns in your final decision. If you have any questions please contact me at (702) 687-6382 or Julie Butler, Clearinghouse Coordinator/SPOC, at (702) 687-6367.

Sincerely,

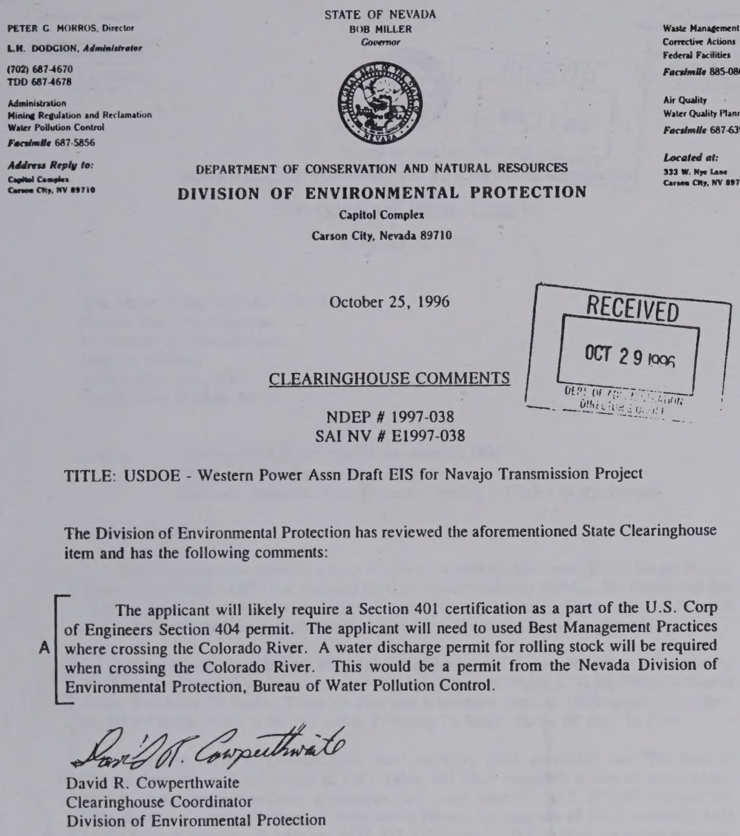
Terri Rodefer

Terri Rodefer, Environmental Advocate
Nevada State Clearinghouse

Enclosures

A No response is necessary.

7a



PETER G. MORROS, Director
L.H. DODGION, *Administrator*
(702) 687-4670
TDD 687-4678
Administration
Mining Regulation and Reclamation
Water Pollution Control
Facsimile 687-5856
Address Reply to:
Capitol Complex
Carson City, NV 89710

STATE OF NEVADA
BOB MILLER
Governor

DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION
Capitol Complex
Carson City, Nevada 89710

Waste Management
Corrective Actions
Federal Facilities
Facsimile 885-0868
Air Quality
Water Quality Planning
Facsimile 687-6396
Located at:
333 W. Nye Lane
Carson City, NV 89710

October 25, 1996

RECEIVED
OCT 29 1996
DEPT OF CONSERVATION
DIRECTOR'S OFFICE

CLEARINGHOUSE COMMENTS

NDEP # 1997-038
SAI NV # E1997-038

TITLE: USDOE - Western Power Assn Draft EIS for Navajo Transmission Project

The Division of Environmental Protection has reviewed the aforementioned State Clearinghouse item and has the following comments:

A The applicant will likely require a Section 401 certification as a part of the U.S. Corp of Engineers Section 404 permit. The applicant will need to used Best Management Practices where crossing the Colorado River. A water discharge permit for rolling stock will be required when crossing the Colorado River. This would be a permit from the Nevada Division of Environmental Protection, Bureau of Water Pollution Control.

David R. Cowperthwaite

David R. Cowperthwaite
Clearinghouse Coordinator
Division of Environmental Protection

A DPA, the applicant, will comply with the requirements. The construction of the transmission line will be in conformance with best management practices where crossing the Colorado and other rivers. As indicated on Table 1-2, NTP will comply with Federal, state, and local permit requirements including Section 401 and 404 permits. Regarding a water discharge permit for rolling stock, at this time we do not anticipate that any equipment associated with construction of the line would enter the water of the Colorado River. However, when the permitting processes are underway, requirements for obtaining applicable permits and approval would entail estimating and addressing avoidance, protection, and mitigative measures. A water discharge permit for rolling stock would be obtained from the Nevada Division of Environmental Protection, Bureau of Water Pollution Control (if required).

7b

PETER G. MORROS
Director
Department of Conservation and Natural Resources

PAMELA B. WILCOX
Administrator

BOB MILLER
Governor

State Land Office
State Land Use Planning Agency
Address Reply to
Division of State Lands
Capitol Complex
Carson City, Nevada 89710
(702) 687-4363

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES

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DIRECTOR'S OFFICE

Division of State Lands

November 18, 1996

Julie Butler, Clearinghouse Coordinator
Nevada State Clearinghouse
Department of Administration
Planning Division
Blasdel Bldg.,Rm. 200
Carson City, Nevada 89710

Subject: Nevada SAI# E1997-038 / November 26,1996
DEIS - Navajo Transmission Project
Proposed Colorado River Channel Crossing Clark County, Nevada

Dear Ms. Butler:

This office has examined the subject Draft Environmental Statement (DEIS) for the Navajo Transmission Project (NTP) as proposed by Dine Power Authority (DPA). We understand that DPA, an enterprise of the Navajo Nation, is proposing to construct and operate the NTP, a 500 kilovolt transmission line between northwestern New Mexico and southern Nevada.

Two alternative routes for the proposed transmission line into Nevada require crossing the Colorado River. A northern route to Mead Substation, N1W,N2,S2 (Link 2060), is located within Township 24 South, Range 66 East and a southern route to Marketplace Substation, N3,N4,S4 (Link 2040), is located within Township 26 South, Range 66 East, M.D.M.

A Attorney Generals Opinion #204 dated April 20, 1976, concluded that "The State of Nevada owns the bed and shores of Lake Tahoe and other navigable bodies of water within Nevada to the present ordinary permanent high water mark." NRS 537.010 declares the Colorado River a navigable body of water within Nevada for purposes of fixing ownership held by the State of Nevada. In addition, NRS 322.050 through 322.070 gives the administrator of the Division of State Lands the authority to grant easements over or upon any land owned by the State of Nevada.

A DPA, the applicant, will comply with the requirements under NRS 322.050 through 322.070 and, prior to construction across the Colorado River channel, will submit an application to the Nevada Division of State Lands for the examination, review, and approval in order to acquire an easement and right-of-way. The application will describe all proposed project work, including applicable drawings and a complete legal description as required for an easement and right-of-way.

7b (continued)

Julie Butler
November 18, 1996
Page Two

A A route over the Colorado River for the proposed NTP transmission line requires acquisition of an easement and right-of-way, through the application process, from the State of Nevada. An application must be submitted to this office for examination, review by state agencies and consideration for approval. If the application is approved for a Colorado River crossing, an easement and right-of-way must be granted for the proposed NTP transmission line before any construction work begins. The application must describe all proposed project work along with applicable drawings and include a complete legal description as required for an easement and right-of-way.

Should you have any questions or if you need any clarification, please do not hesitate to contact this office.

Sincerely,

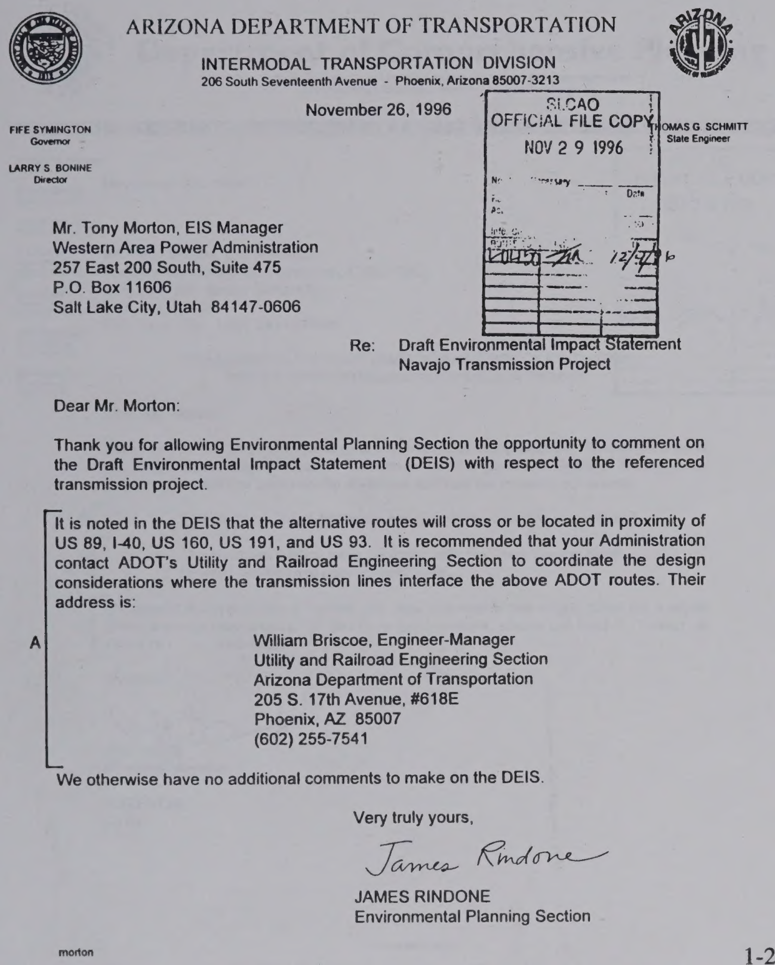
Edward W. Bittleston
Land Agent

EWB/kj

cc: Michael S. Wickersham, Division of Wildlife - Las Vegas
R. Michael Turnipseed, Division of Water Resources
Lewis H. Dodgion, Division of Environmental Protection
Eugene M. Hattori, State Historic Preservation Office

Kevin J. Roukey, Chief, Nevada Office
Regulatory Section Nevada/Sierra Office
U.S. Army Corps of Engineers
C. Clifton Young Federal Bldg.
300 Booth Street
Reno, Nevada 89509

8



ARIZONA DEPARTMENT OF TRANSPORTATION

INTERMODAL TRANSPORTATION DIVISION
206 South Seventeenth Avenue - Phoenix, Arizona 85007-3213

FIFE SYMINGTON
Governor

LARRY S. BONINE
Director

THOMAS G. SCHMITT
State Engineer

November 26, 1996

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Date

Mr. Tony Morton, EIS Manager
Western Area Power Administration
257 East 200 South, Suite 475
P.O. Box 11606
Salt Lake City, Utah 84147-0606

Re: Draft Environmental Impact Statement
Navajo Transmission Project

Dear Mr. Morton:

Thank you for allowing Environmental Planning Section the opportunity to comment on the Draft Environmental Impact Statement (DEIS) with respect to the referenced transmission project.

A It is noted in the DEIS that the alternative routes will cross or be located in proximity of US 89, I-40, US 160, US 191, and US 93. It is recommended that your Administration contact ADOT's Utility and Railroad Engineering Section to coordinate the design considerations where the transmission lines interface the above ADOT routes. Their address is:

William Briscoe, Engineer-Manager
Utility and Railroad Engineering Section
Arizona Department of Transportation
205 S. 17th Avenue, #618E
Phoenix, AZ 85007
(602) 255-7541

We otherwise have no additional comments to make on the DEIS.

Very truly yours,

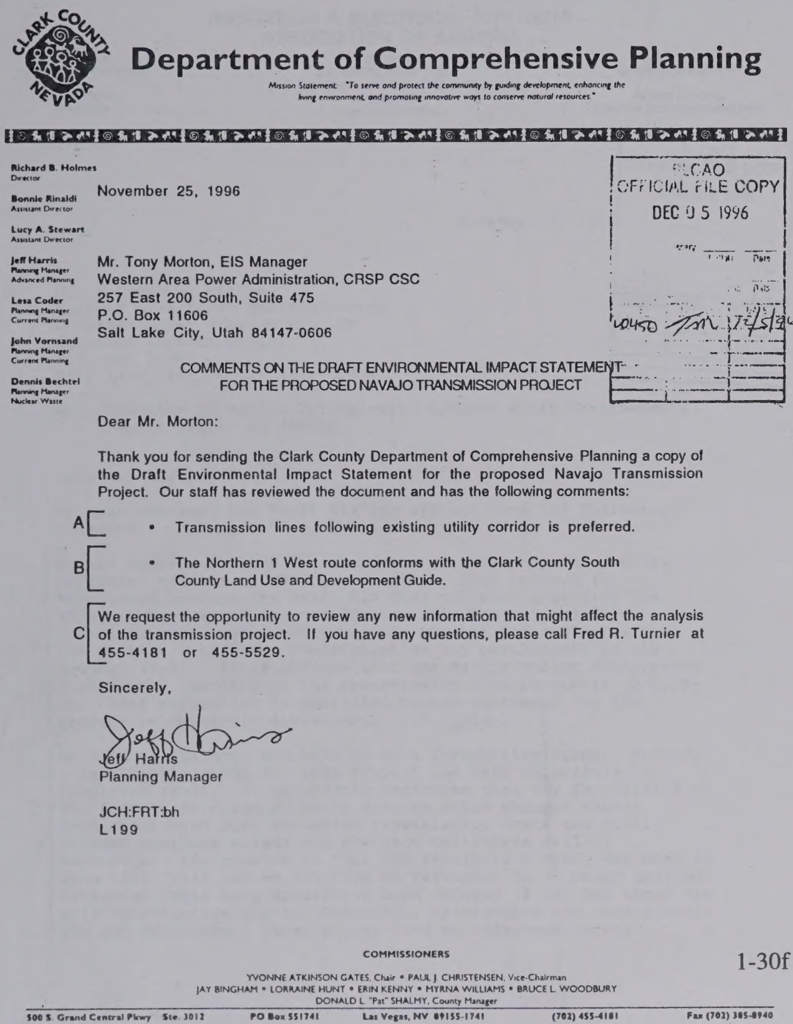
James Rindone

JAMES RINDONE
Environmental Planning Section

morton

A As indicated in the DEIS in Table 1-2, page 1-16, construction of NTP will comply with right-of-way permit requirements through the Arizona Department of Transportation (ADOT). DPA will coordinate design considerations with ADOT where the transmission line interfaces with US 89, I-40, US, 160, US 191, and US 93.

9



CLARK COUNTY NEVADA

Department of Comprehensive Planning

Mission Statement: "To serve and protect the community by guiding development, enhancing the living environment, and promoting innovative ways to conserve natural resources."

Richard B. Holmes
Director

Bonnie Rinaldi
Assistant Director

Lucy A. Stewart
Assistant Director

Jeff Harris
Planning Manager
Advanced Planning

Lesa Coder
Planning Manager
Current Planning

John Vornsand
Planning Manager
Current Planning

Dennis Bechtel
Planning Manager
Nuclear Waste

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November 25, 1996

Mr. Tony Morton, EIS Manager
Western Area Power Administration, CRSP CSC
257 East 200 South, Suite 475
P.O. Box 11606
Salt Lake City, Utah 84147-0606

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE PROPOSED NAVAJO TRANSMISSION PROJECT

Dear Mr. Morton:

Thank you for sending the Clark County Department of Comprehensive Planning a copy of the Draft Environmental Impact Statement for the proposed Navajo Transmission Project. Our staff has reviewed the document and has the following comments:

A
- Transmission lines following existing utility corridor is preferred.

B
- The Northern 1 West route conforms with the Clark County South County Land Use and Development Guide.

C We request the opportunity to review any new information that might affect the analysis of the transmission project. If you have any questions, please call Fred R. Turnier at 455-4181 or 455-5529.

Sincerely,

Jeff Harris

Jeff Harris
Planning Manager

JCH:FRT:bh
L199

COMMISSIONERS

YVONNE ATKINSON GATES, Chair • PAUL J. CHRISTENSEN, Vice-Chairman
JAY BINGHAM • LORRAINE HUNT • ERIN KENNY • MYRNA WILLIAMS • BRUCE L. WOODBURY
DONALD L. "Pat" SHALMY, County Manager

500 S. Grand Central Pkwy Ste. 3012 PO Box 551741 Las Vegas, NV 89155-1741 (702) 455-4181 Fax (702) 385-8940

A Your comment has been noted. Where possible, alternative corridors for NTP have been located within, or adjacent to, existing utility corridors as explained on pages S-6 and 3-39 of the DEIS.

B Your comment has been noted.

C DPA and Western will continue to coordinate with Clark County Department of Comprehensive Planning regarding any new information that may affect the analysis of the transmission project.

10

IRRIGATION & ELECTRICAL DISTRICTS ASSOCIATION OF ARIZONA

W.A. DUNN
CHAIRMAN OF THE BOARD

R. GALE PEARCE
PRESIDENT

R.D. JUSTICE
VICE-PRESIDENT

SUITE 204
2001 NORTH THIRD STREET
PHOENIX, ARIZONA 85004-1472
(602) 254-5908
FAX (602) 257-9542

CLYDE GOULD
SECRETARY-TREASURER

ROBERT S. LYNCH
ASSISTANT SECRETARY-TREASURER

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DEC 09 1996

December 5, 1996

Mr. Anthony G. Morton
Western Area Power Administration
Colorado River Storage Project
Customer Service Center
P.O. Box 11606
Salt Lake City, Utah 84147-0606

Re: Comments on Navajo Transmission Project Draft Environmental Impact Statement (DEIS)

Dear Mr. Morton:

We have reviewed the Draft EIS for NTP and have the following comments.

A We are concerned about the economics of this proposal and its potential effects on CRSP power rates. That concern is heightened because the Draft EIS does not even summarize the economic boundaries for considering this Project feasible. Ordinarily that would not worry us, but the EIS indicates that the Western Area Power Administration may participate in the Project (1-2). It is obvious that the Navajo Nation anticipates leasing the capacity of the transmission line to others (S-2, 1-2). That assumption is qualified by the statement "As the project is currently envisioned, ..." (Ibid.).

B We know an EIS does not have to be a feasibility study. Indeed, a feasibility study for this Project has been separately completed (1-7). It apparently indicates that the feasibility of the Project is based on being able to match cheaper energy production with more expensive transmission costs and still attract southern Nevada and southern California utility customers. The problem is that the feasibility study was done in June 1992 (vii) and we can find no reference to it being updated. Estimated costs have apparently been updated (2-34) but these are only construction costs. Operation, maintenance and repair costs are not addressed. Thus, we can find no reference to any

A Western appreciates your concern for the feasibility of this project. However, the economic feasibility of a project is not an environmental factor to be studied in an EIS. As stated by the Council on Environmental Quality (40 CFR 1500.1(c)) "The NEPA process is intended to help public decisions that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment."

B We agree that an EIS is not a feasibility study and that an environmental feasibility study was completed in June 1992. Although there are economic factors that would determine Western's participation in the project if it were built, these factors will be considered and result in a business decision separate from the environmental review.

10 (continued)

Mr. Anthony G. Morton
December 5, 1996
Page 2

B	analysis of the impact of the FERC Open Access Tariff regulations, assuming their applicability through the reciprocity provision or otherwise, although their existence is noted (1-7).	
C	Our concern is that neither we nor Western know from this document whether Western's participation in this Project would be advisable. The Draft EIS assumes that Western's participation in the Project would benefit CRSP customers (I-4). However, that statement is based totally on increasing reliability of the system generally and not upon cost.	**C** Your comment has been noted. The EIS is not intended to address the advisability of participation; rather, it is intended to address the environmental impacts of the projects. Western will consider these impacts as well as economic and other business factors to make a decision regarding Western's participation. Western believes that system reliability would be a benefit of this project, but costs related to participation are part of the business decision.
D	The Draft EIS indicates that Dine Power Authority is the "majority owner" of the Project (1-2). However, at several places the reference is made to Dine Power Authority proposing to construct, operate and maintain the transmission line (S-1, vi).	**D** Yes. At this time, it is the intent that DPA would own all or the majority of NTP; however, until participation is negotiated, it is not possible to know or state the exact level of ownership. Also, it is the intent that DPA would be responsible for construction, operation, and maintenance of the line.
E	Since our concerns, and presumably those of the rest of your CRSP customers, except perhaps the Navajo Tribal Utility Authority, are for the most part economic, it would have been helpful to have more information about these issues in the Draft EIS before the December 5, 1996 comment deadline. Expanded discussion of feasibility and cost issues should be included in the final EIS.	**E** Please refer to the responses to comments A, B, and C above. The feasibility and cost issues are not subjects of this EIS.
F	The existence of FERC Orders 888 and 889 and the filing of Open Access Tariffs (OAT's) might very well be considered significant new circumstances or information that might require supplementing the Draft EIS. 40 C.F.R. Section 1502.9(c)(1)(ii). At the very least, the existence of these regulations and their probable impacts need to have expanded discussion in the final EIS. Moreover, competing utility OAT's may affect feasibility of this Project and must be analyzed.	**F** Your comment has been noted. However, the existence of FERC Orders 888 and 889 and the filing of Open Access Tariffs relate to the business decisions of the feasibility of this project. That will be part of the information, along with the environmental impacts of the project, that will be considered by Western when making a decision about participation in this project.
G	We do not know whether the 1992 Feasibility Study carried with it a cost benefit analysis. If it did, it must be discussed in at least some detail in the EIS. 40 C.F.R. Section 1502.23. If it did not but it included some economic assumptions about funding, participation by others, and especially rates that could be charged, the continued validity of those assumptions must be measured against FERC Orders 888 and 889 on the assumption that, at the very least, this Project will fall under those Orders through the reciprocity provision and, possibly, SWRTA and WRTA bylaw requirements. Here again, competitive forces in the new OAT market may also require altering economic assumptions and feasibility analysis. These significant changes in the industry cannot be ignored.	**G** Please refer to the response to comment F above. Referring to your citation of 40 CFR 1502.23 CEQ states "*If a cost-benefit analysis relevant to the choice among environmentally different alternatives is being considered for the proposed action...* [emphasis added]." The analysis to which you refer relates to the feasibility of the project and not an analysis of competing alternatives, and is not appropriate for the EIS.

10 (continued)

Mr. Anthony G. Morton
December 5, 1996
Page 3

H Thank you for the opportunity to comment on this important proposal and its Draft EIS. If Western decides to supplement the Draft EIS, please let us know. If there are going to be further meetings in areas more convenient to the CRSP contractors, we would like to know that also. Please let us know how Western intends to proceed on the issues of supplementing and further public meetings.

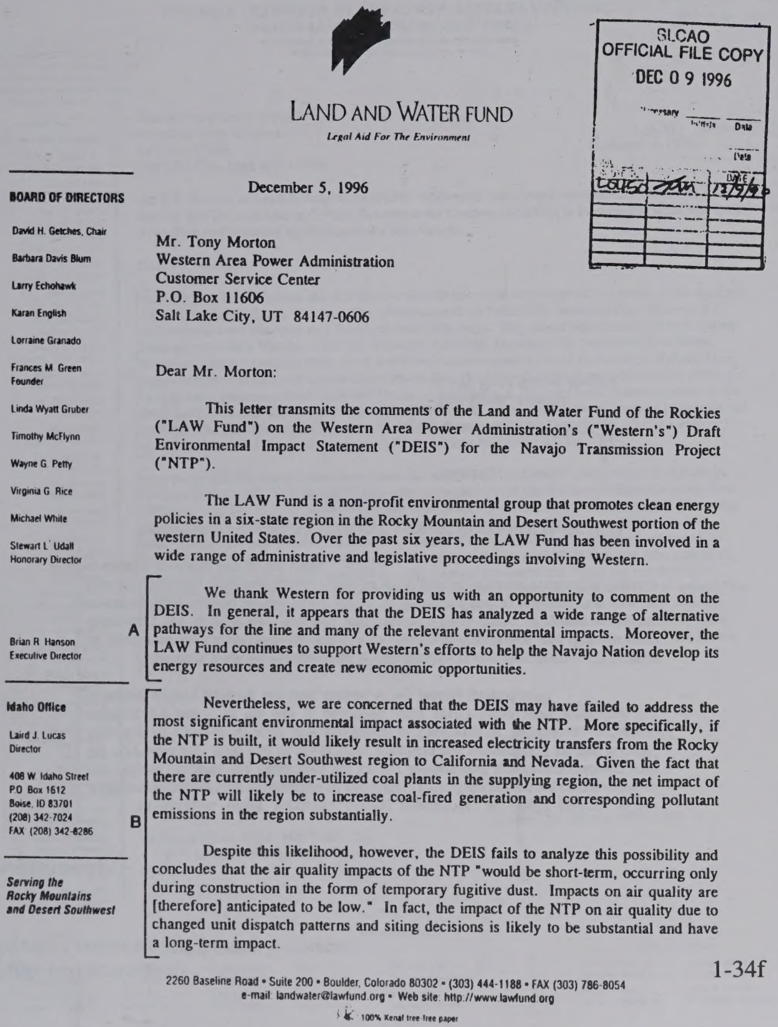
Sincerely,

Robert S. Lynch
Asst. Secretary-Treasurer

RSL:psr
cc: IEDA Management Committee
CREDA Environmental Studies Work Group

H Western conducted 44 hearings on the DEIS throughout the project area including hearings in Boulder City, Nevada; Flagstaff, Arizona; and Farmington, New Mexico. For the purposes of this EIS, no other public meetings or hearings or other opportunities will be provided to comment on the potential for environmental impacts. Western will communicate with our customers regarding our potential participation in the project when the time is appropriate to make that decision.

11



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Serving the Rocky Mountains and Desert Southwest

December 5, 1996

Mr. Tony Morton
Western Area Power Administration
Customer Service Center
P.O. Box 11606
Salt Lake City, UT 84147-0606

Dear Mr. Morton:

This letter transmits the comments of the Land and Water Fund of the Rockies ("LAW Fund") on the Western Area Power Administration's ("Western's") Draft Environmental Impact Statement ("DEIS") for the Navajo Transmission Project ("NTP").

The LAW Fund is a non-profit environmental group that promotes clean energy policies in a six-state region in the Rocky Mountain and Desert Southwest portion of the western United States. Over the past six years, the LAW Fund has been involved in a wide range of administrative and legislative proceedings involving Western.

A We thank Western for providing us with an opportunity to comment on the DEIS. In general, it appears that the DEIS has analyzed a wide range of alternative pathways for the line and many of the relevant environmental impacts. Moreover, the LAW Fund continues to support Western's efforts to help the Navajo Nation develop its energy resources and create new economic opportunities.

B Nevertheless, we are concerned that the DEIS may have failed to address the most significant environmental impact associated with the NTP. More specifically, if the NTP is built, it would likely result in increased electricity transfers from the Rocky Mountain and Desert Southwest region to California and Nevada. Given the fact that there are currently under-utilized coal plants in the supplying region, the net impact of the NTP will likely be to increase coal-fired generation and corresponding pollutant emissions in the region substantially.

Despite this likelihood, however, the DEIS fails to analyze this possibility and concludes that the air quality impacts of the NTP "would be short-term, occurring only during construction in the form of temporary fugitive dust. Impacts on air quality are [therefore] anticipated to be low." In fact, the impact of the NTP on air quality due to changed unit dispatch patterns and siting decisions is likely to be substantial and have a long-term impact.

2260 Baseline Road • Suite 200 • Boulder, Colorado 80302 • (303) 444-1188 • FAX (303) 786-8054
e-mail: landwater@lawfund.org • Web site: http://www.lawfund.org

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A Your comment has been noted.

B In response to this comment and similar comments received during informal conversations, Western added discussion in FEIS Chapter 2 in the section addressing addenda.

11 (continued)

C In addition, under Western's current regulations, the DEIS analysis is not sufficient to support the expenditure of significant federal dollars on the construction of this project. Indeed, the DEIS does not answer fundamental questions associated with the NTP such as: Who will be the primary suppliers and customers if the line is built? Would it be cheaper to build new generation in California or Nevada as opposed to building the line? If the line is economic, why aren't these other supplying and customer entities building this line, instead of the federal government?

D Consistent with the requirements of Western's existing regulations, "Principles of Integrated Resource Planning for Use in Resource Acquisition and Transmission Planning", we believe that Western must answer these types of questions before investing more than $5 million in the NTP.[1] If Western's role in this project is smaller than this such that these regulations would be not triggered, then we would urge Western to clearly state that fact in the DEIS.

Thank you for providing us with an opportunity to comment on the DEIS.

Sincerely,

Eric Blank

Eric Blank, Director
LAW Fund Energy Project

---

[1] See, e.g., Federal Register, Vol. 59, No. 233, December 6, 1994, at 62725-26.

C There is nothing in the DEIS to suggest that the Federal government, specifically Western, would be building this transmission line. The proponent of the project is DPA, an enterprise of the Navajo Nation. The actual level of participation by Western in this project will be determined at the time when all other subscribers are approached. At this time, it is not known who other subscribers would be. Western is facilitating the preparation of the EIS, and acting as an advisor to DPA. Regarding whether it is cheaper to build generation closer to the load centers, the project as it is proposed is construction, operation, and maintenance of a transmission line and, therefore, this question is not within the scope of this EIS. Concerning whether entities other than Western should be working with DPA to build this line—Western is honored that others have tried to work with the Navajo Nation in years past to develop such a project. Western was chosen by DPA when the Navajo Nation decided it was ready to go forward with it. And, related to the previous question, the Navajo Nation does not own land in Nevada or California, making new generation construction in that area impractical for the Navajo Nation.

D Those principles that would apply to the NTP would be the Transmission Planning Principles (59 FR 62725), which state that Western will conduct a public process to evaluate needs as well as costs, environmental impacts, and system reliability of any new or rebuild of our transmission system. The specific process outlined in these principles was developed well after the beginning of the environmental review of this project, but Western is meeting and will continue to adhere to these principles when it becomes time for Western to make decisions about its participation in this project. At this time, however, it remains a proposal of DPA, which Western is assisting in the preparation of the EIS.

12

NEVADA OUTDOOR RECREATION ASSOCIATION, INC.
NATIONAL PUBLIC LANDS TASK FORCE
SOUTHWEST WILDLANDS EDUCATIONAL INSTITUTE (NORA)
NORTHERN ROCKIES BLM TASK FORCE (NORA)

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Navajo Transmission Project
Attention: Tony G. Morton
P.O. Box 11606
Salt Lake City, Utah 84147-0606

December 6, 1996

Re: U.S. Bureau of Land Management (BLM) wilderness "non-impairment violation" (FLPMA Section 603/202 and *Area of Critical Environmental Concern* (ACECs)) in Farmington BLM Resource Area, NM and Stateline BLM Resource Area, Nevada.

Dear Mr. Morton:

A Near the Shiprock Substation the facilities intrude within a major archeological area known as the Hogback Afro-Phoenician Tifinagh ridge area. The Albuquerque BLM Field Office some years ago discovered a controversial Pre-Columbian area that is *not* Anasazi in origin. They have a report connected with Viking landings in the New World (c. 1108 AD, Heavener State Park, Heavener, OK. re: University of Tulsa, Tulsa, OK) via the Arkansas River where it believed eastern-speaking (*Farsi*, the language of Persia/Iran) peoples came in contact with ancient native Americans. The Tifinagh writings were found in the 1980s (we have pictures taken on a BLM "*show me*" trip out of Albuquerque). They are found in several places in the north end of San Juan Basin. The Albuquerque BLM District archeologists believe they may be genuine and probably also the University of Tulsa (re: the Viking connection in Oklahoma?). This may be a serious violation of the 1905 Antiquities Act and FLPMA Sections 102(a) and 201 (a).

B Here in Nevada, this transmission line corridor is a major "non-impairment" (IMP) violation of FLPMA Sections 603 and 202. There is a citizen coalition proposal for both the El Dorado Wilderness Study Area (WSA) and the Iriteba Peaks Wilderness Study Area. Both are recommended for wilderness in the coming 105th Congress in a Nevada BLM Wilderness Act. Iriteba Peaks WSA has awesome diorite-granitic intrusions geologically similar to Joshua Tree National Park. It is critical *desert tortoise* habitat and we have reason to believe the corridor is within the meaning of the Stateline BLM Resource Area tortoise (a *threatened* species within the meaning of the 1969 National Environmental Policy Act and the 1973 Endangered Species Act (ESA)) management plan (a 1966 MFP) which has been under IBLA appeal. The El Dorado Wilderness Study Area is a "*hodad*" connected to Lake Mead National Recreation Area near Searchlight, Clark County, Nevada. This WSA is known to contain perhaps the largest natural bridge in Nevada. This organization has visited and explored both and we have copious documentation. We reserve the right to appeal any decision to the Interior Board of Land Appeals (IBLA).

Yours very sincerely,

Charles S. Watson Jr.

Charles S. Watson, Jr.
Executive Director
NORA, Inc.
P.O. Box 1245
Carson City, Nevada 89702-1245

cc: Larry Silver, CELP, Mill Valley, CA
Bob Taylor, Las Vegas BLM District.
file

IN MEMORIAM

(NORA Founders)

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Sparks, Nevada

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Carmelita Lowry
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Pt. Tobacco, Maryland

A Apparently the referenced archaeological area is a petroglyph site designated by the BLM as 4546, which was recorded in 1979. It has been suggested that the glyphs may represent Old World symbols, but the BLM Farmington District Office archaeologist considers evidence for purported "Tifinagh writings," as well as Farsi-speaking groups, or Vikings in The Hogback area to be dubious. Site 4546 is located approximately three miles from any route being considered, and would not be affected. All archaeological resources along any route approved for construction will be intensively inventoried, and measures to avoid or mitigate any identified adverse impacts on significant resources will be developed and implemented in accordance with a programmatic agreement negotiated to comply with the National Historic Preservation Act.

B Link 2060 of the "southern option" at the western end of the western area transmission line alternatives is along the preferred route but would not encroach on the Iriteba Peaks Wilderness Study Area.

13

THE STATE OF ARIZONA

GAME & FISH DEPARTMENT

2221 West Greenway Road, Phoenix, Arizona 85023-4399 (602) 942-3000

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Date
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December 5, 1996

Mr. Anthony G. Morton
Western Area Power Administration
Colorado River Storage Project
Customer Service Center
P.O. Box 11606
Salt Lake City, Utah 84147-0606

Re: Navajo Transmission Project Mitigation Plan and Draft Environmental Impact Statement (DEIS)

Dear Mr. Morton:

The Arizona Game and Fish Department (Department) has reviewed the above-referenced documents and the following comments are provided.

A To aid in assuring that mitigation and construction impacts are minimized, we recommend video taping the project area by airplane prior to construction. In addition, stationary photo points should be taken at all sensitive areas. This would provide a reference point for completing mitigation. A second video should be taken after construction and mitigation occurs to ensure that all stipulations were completed successfully.

B We are concerned about possible impacts to wildlife should the Southern 2 (S2) or Southern 4 (S4) route be chosen as the preferred alternative. The specific areas of concern are Mesa Butte (T26N, R6E, Sec 9, NW¼) and Howard Mesa near the Red Lake Substation site. These two areas are important winter range for elk, deer and pronghorn antelope. Therefore, we request that if construction is to take place at Mesa Butte or Howard Mesa, that it be conducted during the summer months to minimize disturbance to these species during the more critical winter months.

C Construction disturbance could also increase the use of water sources outside the project area due to displacement of wildlife. To mitigate these affects, there may be a need to haul water to adjacent tanks to insure water availability, especially during the summer.

D Increased long-term human activity in an area can also have a negative impact on wildlife. Any new roads developed during construction of the power line has the potential to increase vehicular access to the area. Therefore, we request that the Department and land management agencies be consulted to determine long-term vehicular access objectives for specific road segments.

A Although Western is not opposed to your request to document the proposed route on video tape and still photography, we would like to discuss the benefit of such documentation, particularly the value of the second video following construction to document the success of mitigation. We cannot be certain that evidence of successful mitigation would be apparent or visible from the air. Also, success of various measures may be achieved at different points over time; therefore, it may be difficult to record all successes at one time (in one taping). Western and DPA have anticipated the need for detailed mitigation planning. As the project progresses, Western and DPA will coordinate with the Arizona Game & Fish Department and land-managing agencies to refine data (if needed) and mitigation on a site-specific basis in accordance with agency policies, guidelines, and requirements. The detailed mitigation plan will be incorporated to develop and implement the project; that is, the construction, operation, and maintenance plan (COMP). The construction contractor will be required to adhere to the COMP.

B Figure MV-4W (DEIS map volume) reflects the information provided by the appropriate agencies. Habitat for deer and pronghorn in the vicinity of the Red Lake Substation site is delineated on the map. In reviewing the information collected during our inventory, we did not receive information regarding elk from any of the agencies contacted, nor were the areas of Mesa Butte or Howard Mesa identified as important winter range for elk, deer, and pronghorn. At present, the proposed route for construction avoids these areas. However, whatever final route is selected for construction, Western and DPA will coordinate with Arizona Game & Fish Department to define site-specific mitigation for sensitive areas.

C If construction occurs in these areas during critical summer periods, DPA will take whatever steps are necessary to ensure the availability of water.

D Western understands and agrees with the need to minimize human intrusions into areas to minimize potential impacts on wildlife. Western and DPA will consult with the Arizona Game & Fish Department and land-management agencies regarding long-term vehicular access objectives. We agree to limit undesirable access to previously inaccessible areas, with the understanding that access to the line will be available for DPA's use, when necessary (e.g., access to maintain the line and respond to emergency situations along the line).

13 (continued)

Mr. Anthony G. Morton
December 5, 1996
2

	Comment		Response
E	Cover is an important component of wildlife habitat. Many areas of private land adjacent to the S2 and S4 corridors have been cleared of pinyon/juniper vegetation. Any further removal of vegetation may adversely affect deer and elk distribution in the project area. As with most of the project area, we request that minimal vegetation be removed during the project, especially near private lands which have been previously cleared of pinyon/juniper.	E	As indicated by generic mitigation measure 3 (Table 2-3, page 2-23 in the DEIS), Western and DPA have committed to leaving vegetation in place wherever possible. Selective mitigation measure 12 (Table 2-7, page 2-45) acknowledges and addresses the need to minimize the clearing of the right-of-way within the limits of conductor-clearance requirements and standard tower design. This measure applies to sensitive areas of piñon/juniper vegetation.
F	The Department recommends that the Western Area Alternative Northern 3 (N3) be pursued as the preferred alternative. This route would bypass the Truxton Flat, and is anticipated to result in the least amount of disturbance to pronghorn which inhabit the area. Truxton Flat is a small area with increasing land use demands. Because the corridor is already crowded with existing developments, we anticipate the power line could add to the long-term cumulative impacts to pronghorn.	F	The preferred route crosses the Hualapai Reservation north of the Truxton Plain.
G	Furthermore, we also concur with the Lake Mead National Recreation Area and the Bureau of Land Management, Kingman Field Office that the N1W southern crossing of the Colorado River should be the preferred alternative. We also suggest that the access road associated with this portion of the transmission line be returned to its preconstruction condition.	G	Your preference for the southern crossing of the Colorado River has been noted and will be considered in Western's decision process. Regarding your comment about access roads, refer to the response to comment D above.
H	Should the northern route be chosen as the preferred alternative, we request that no construction be undertaken during the approximate elk calving and pronghorn fawning periods of May through June. This is especially important within two miles of the following water sources on the Kaibab National Forest: Banks Tank, Bloody Tank, New Automobile Tank, Hupmobile Tank, an unnamed trick tank under the current power line between Banks and Willow tanks, and Res Tank, southeast of Yeager Bly Tank.	H	In reviewing the data collected during our inventory, we did not receive information that elk calving and pronghorn fawning were concerns along the northern route. However, whatever final route is selected for construction, Western and DPA will coordinate with Arizona Game & Fish Department to define site-specific mitigation for sensitive areas.
I	Regardless of the corridor chosen as the preferred, we recommend that grass and browse seed native to the project area be utilized to reseed any areas where ground disturbance or removal of vegetation is required.	I	As explained by generic mitigation measure 4 (Table 2-3 page 2-23 in the DEIS), where ground disturbance from construction activities is substantial or where recontouring is required, the disturbed surface areas will be restored as required by the landowner or land-managing agency. This will include the reseeding of areas with grass and browse seed native to the project area.

Thank you for the opportunity to provide these comments. If you have any questions, please contact me at (602) 789-3605.

Sincerely,

Ron Christofferson

Ron Christofferson
Project Evaluation Coordinator
Habitat Branch

RAC:rc

cc: Tom Britt, Regional Supervisor, Region II, Flagstaff
Rod Lucas, Regional Supervisor, Region III, Kingman

AGFD# 10-23-96(07) & 11-05-96(01)

14

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

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DEC 0 6 1996

Anthony G. Morton
Western Area Power Administration
Colorado River Storage Project
Customer Service Center
P.O. Box 11606
Salt Lake City, Utah 84147

Dear Mr. Morton:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the NAVAJO TRANSMISSION PROJECT, Nevada, Arizona and New Mexico. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, and the Council on Environmental Quality's Regulations for Implementing NEPA (40 CFR 1500-1508). We appreciate the individual extension which you granted to EPA allowing us to submit comments by Monday, December 9, 1996.

Dine Power Authority, an enterprise of the Navajo Nation, proposes to construct a 500 kilovolt transmission line to deliver electric power from the Shiprock Substation in northwestern New Mexico to either the Mead or Marketplace Substations in southern Nevada. The new transmission line would relieve constraints on electrical transmission west from the Four Corners area; improve operational flexibility and reliability of the overall system; and allow increased economical transfers, sales and purchases in the Rocky Mountains/Four Corners/Desert Southwest region. The DEIS also indicates that the proposed project would aid the economic development of the Navajo Nation.

A Based on our review of the DEIS, we have rated the document as **EC-2, Environmental Concerns - Insufficient Information.** The enclosed "Summary of Rating Definitions and Follow-Up Action" explains EPA's rating system more thoroughly. We have environmental concerns because the DEIS did not discuss the project's consistency with the requirements of Section 404 of the Clean Water Act governing the placement of fill material in waters of the United States, including wetlands and other special aquatic sites. The Final Environmental Impact Statement (FEIS) should address this issue as well as the stormwater permit requirements of the Clean Water Act and consistency with a recent Executive Order on Indian sacred sites. We also recommend that all reasonable pollution prevention measures be integrated in the project's design, construction and operation.

A Refer to the responses to specific comments C, D, E, F, G, and H below.

14 (continued)

DEC 0 6 1996

B We appreciate the opportunity to comment. Please send one copy of the FEIS to me (mailcode: CMD-2) at the letterhead address when the document is filed with EPA's Washington, D.C. office. If you have any questions, please call me at 415-744-1584 or David Tomsovic, lead reviewer for this document, at 415-744-1575.

Sincerely,

David Farrel, Chief
Federal Activities Office

cc: Eugene Bromley, EPA Region IX
Brent Larsen, EPA Region IX
Robb Saunders, NDEP

Attachments: 3
- a) EPA rating system for DEISs
- b) Detailed comments on DEIS
- c) Executive Order 13007

M.I. #001942

B Your comment is noted. Western will send a copy of the FEIS to Mr. Farrel when the document is filed with EPA's Washington, D.C. office.

14 (continued)

CLEAN WATER ACT

DEC 0 6 1996

Section 404 Permitting

C The Draft Environmental Impact Statement (DEIS) did not address the proposed project's consistency with Section 404 of the Clean Water Act (CWA). The proposed project requires authorization under Section 404 of the CWA since a number of water bodies will be crossed. We recommend that your office contact the appropriate Army Corps of Engineers' District Offices to identify Section 404 requirements that may prove applicable to the project. Additionally, we recommend that the Final Environmental Impact Statement (FEIS) discuss the amount of fill material that would be placed in waters of the United States, including wetlands and other special aquatic sites; identify whether all practicable means have been undertaken to minimize the placement of fill material in wetlands and other areas subject to Section 404 jurisdiction; and identify mitigation for unavoidable adverse impacts to Section 404-regulated resources.

Stormwater Permit

D The FEIS should discuss the applicability of the stormwater permit provisions of the CWA. Depending on the acreage of land disturbed by the project in each of the three States, compliance with CWA stormwater permitting requirements may prove applicable. You should note that stormwater permit authorization will likely be needed from three offices: EPA Region VI in Dallas; EPA Region IX in San Francisco; and the Nevada Division of Environmental Protection in Carson City, NV. Under the CWA, permits are required for all stormwater discharges associated with construction where clearing, grading and excavation results in land disturbance of five (5) or more acres. Stormwater discharges from construction activity disturbing less than five acres, but which are part of a larger common plan or development, also need a permit. Landowners are required to develop and implement a stormwater pollution prevention plan where such construction occurs.

Because the project crosses three States, it will be necessary for your agency and/or the Dine Power Authority to contact the following individuals for stormwater permit requirements on affected lands in Arizona, New Mexico and Nevada:

Arizona (tribal and non-tribal lands)
Eugene Bromley, EPA Region IX
phone: 415-744-1575

New Mexico (Navajo land)
Mr. Bromley

C No specific information on water resources was provided since the analysis showed that there would be less than significant impacts on water resources. At this time, it is impossible to state with any accuracy the amount of fill, if any, that would be placed in waters of the United States since the exact locations of such disturbances will not be known until after detailed engineering studies have been completed following the release of the FEIS. Because the transmission line would span water bodies and installation of towers would be at a distance from shorelines sufficient to minimize or preclude disturbance at shorelines, placing fill in waters of the United States is not anticipated. However, the required permits will be obtained prior to construction, if needed. When the permitting processes are underway, requirements for obtaining applicable permits and approval would entail estimating impacts and addressing avoidance, protection, and mitigative measures.

D As indicated in Table 1-2, page 1-10, Western and DPA recognize that stormwater permitting under the Clean Water Act will be required. Thank you for the names and telephone numbers of the personnel to contact.

14 (continued)

DEC 06 1996

D New Mexico (non-tribal lands)
Brent Larsen, EPA Region VI
phone: 214-665-7523

Nevada (non-tribal lands)
Robb Saunders, NV Division of Environmental Protection
phone: 702-687-4670

TOXIC SUBSTANCES CONTROL ACT

E The FEIS should discuss whether the proposed project would involve the disturbance and/or removal of polychlorinated biphenyls (PCBs) which may be in active use or in storage. It is unclear whether PCBs subject to US EPA regulatory oversight (i.e., at concentrations of 50 parts per million or greater) are currently in use in transformers or electrical equipment, or whether PCBs may be in storage in areas subject to project-related work. If so, the FEIS should provide a discussion regarding their location, volume and related information. Additionally, it would be useful if the FEIS indicated whether PCBs below the Federal regulatory threshold (i.e., less than 50 parts per million) are currently in use or in storage in areas where project work would occur.

HAZARDOUS WASTE & HAZARDOUS MATERIALS

F The DEIS (p. 4-3) indicates that accidents involving construction equipment adjacent to surface waters could cause water pollution problems due to spills of petroleum products or construction materials. We strongly recommend that mitigation measures to control such adverse impacts be identified in the FEIS, and appropriate commitments included in the Record of Decision.

INDIAN SACRED SITES

G We recommend that the FEIS discuss the applicability of Executive Order 13007, Indian Sacred Sites, signed by the President earlier in 1996 (copy attached). Executive Order 13007 provides that Federal land managers (in the case of this project, National Park Service, Forest Service and Bureau of Land Management) need to accommodate access to, and ceremonial use of, Indian sacred sites by Indian religious practitioners and to avoid "adversely affecting the physical integrity of such sacred sites." We recommend that, prior to finalizing the FEIS, your agency contact appropriate authorities of the Navajo Nation, Hopi Tribe and Hualapai Tribe to determine whether the proposed project's construction or operation may adversely affect such sacred sites on Navajo, Hopi or Hualapai lands. Additionally, the other Tribes mentioned on p. 5-12 of the DEIS (San Juan Southern Paiute Tribe, Yavapai-Prescott Tribe, etc) may also have concerns, recommendations or information to offer under Executive Order 13007.

E The project would not employ existing equipment; rather, new equipment would be installed, which will use PCB-free materials for insulation.

F As stated on page 2-33 of the DEIS, "A health and safety plan addressing procedures to respond to accidental release of hazardous materials would be developed as part of the COMP (construction, operation, and maintenance plan) during the engineering-design phase of the project." Obtaining 404, 401, and stormwater permits as well as addressing applicable Clean Water Act Section 311, Spill Prevention, Control, and Countermeasures (SPCC) requirements for preventing pollution from oil and hazardous substances entails formulating plans to prevent degradation to waters of the United States from the various construction-related activities, and the introduction of new project-related facilities.

G Extensive consultations with 15 American Indian tribes and groups were conducted in conjunction with preparation of the DEIS (see page 5-12), and three studies were conducted with direct involvement of the cultural and historic preservation offices of the Navajo, Hopi, and Hualapai tribes. These consultations and studies broadly addressed traditional cultural places and resources, including Indian sacred sites that are the focus of Executive Order 13007, along all alternative corridors regardless of land ownership. The studies are reported in the cultural resources technical documentation supporting the DEIS, except for confidential information retained by the tribes (an issue acknowledged by Executive Order 13007). These consultations exceed the requirements of the Executive Order (see letter of comment from the Arizona State Historic Preservation Office that characterizes the involvement of affected tribes as thorough). To date, no "specific, discrete, narrowly delineated" sacred sites, as specified by the Executive Order, have been identified as subject to project impacts on Federal lands (which Executive Order 13007 defines as excluding tribal lands). Any right-of-way across tribal lands along a route selected for construction must be granted by those tribes, and therefore they will have additional opportunities to consider impacts on sacred sites and other traditional cultural places. Other interested tribes also have been invited to concur in a programmatic agreement that specifies additional opportunities for review of intensive inventories of cultural resources, including traditional cultural places, along any route approved for construction. In sum, the applicability of Executive Order 13007 is acknowledged, along with numerous other Federal, tribal, and state laws and regulations protecting cultural resources, and they will continue to be addressed in subsequent phases of project implementation. Any specific procedural modifications developed by Federal agencies in response Executive Order 13007 will be followed as appropriate.

14 (continued)

DEC 0 6 1996

	POLLUTION PREVENTION		
H	The Council on Environmental Quality (CEQ) issued a memorandum to Federal agencies concerning the inclusion of pollution prevention principles and techniques in Federal agencies' NEPA documents (1/29/93 Federal Register at pp. 6478-6481). The CEQ adopted a very broad definition of pollution prevention, including reducing/eliminating hazardous pollutants; modifying industrial processes; recycling; and increased energy efficiency and conservation. We encourage your agency and the Dine Power Authority to identify applicable pollution prevention measures that can be incorporated in the proposed project. The FEIS and Record of Decision should reflect a commitment to implement pollution prevention measures in the design, construction and operation of the new facility.	H	Western and DPA will commit to pollution prevention measures, as indicated in the DEIS on pages 2-32 and 2-33. Such measures will be outlined in the construction, operation, and maintenance plan (COMP). Obtaining required protection permits and approvals for waters of the United States will entail planning activities and identifying measures that will prevent degradation to water bodies, including wetlands, from release or discharge of soil, construction materials and wastes, hazardous substances used in construction or for new project-related facilities.
	EDITORIAL COMMENTS		
I	1. Page 1-11 indicates that a CWA Section 401 permit for a discharge into waters of the state (including wetlands and washes) is done by "EPA on tribal lands." The wording "EPA on tribal lands" should be changed to read "EPA on tribal lands and in non-delegated States." As of the date, the Section 401 permit issuance program has been delegated to the State of Nevada, and thus Nevada has authority to issue the Section 401 permit. However, the Section 401 permit issuance program has not been delegated to either Arizona or New Mexico, thus in those two States the EPA regional offices (Region IX for Arizona; Region VI for New Mexico) have the authority to issue the Section 401 permits, except for Navajo lands in New Mexico, where EPA Region IX would issue the permit.	I	Your comment has been noted and the correction is reflected in the FEIS Table 2-1f.
J	2. Page 1-11 indicates that a permit to discharge dredge or fill material to a watercourse would be issued by "EPA on tribal lands." In fact, the Army Corps of Engineers is the responsible permit issuing agency in this regard for both tribal and non-tribal lands. Accordingly, the wording "EPA on tribal lands" should be deleted from that page of the text.	J	Your comment has been noted and the correction is reflected in the FEIS Table 2-1f.

14 (continued)

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

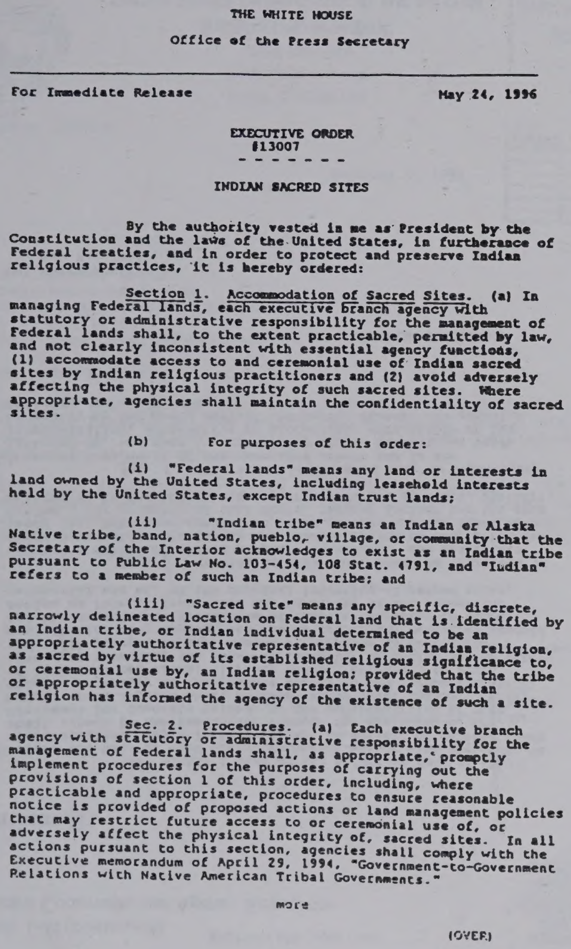
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

14 (continued)



THE WHITE HOUSE

Office of the Press Secretary

For Immediate Release May 24, 1996

EXECUTIVE ORDER
#13007

- - - - - - - -

INDIAN SACRED SITES

By the authority vested in me as President by the Constitution and the laws of the United States, in furtherance of Federal treaties, and in order to protect and preserve Indian religious practices, it is hereby ordered:

Section 1. Accommodation of Sacred Sites. (a) In managing Federal lands, each executive branch agency with statutory or administrative responsibility for the management of Federal lands shall, to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions, (1) accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners and (2) avoid adversely affecting the physical integrity of such sacred sites. Where appropriate, agencies shall maintain the confidentiality of sacred sites.

(b) For purposes of this order:

(i) "Federal lands" means any land or interests in land owned by the United States, including leasehold interests held by the United States, except Indian trust lands;

(ii) "Indian tribe" means an Indian or Alaska Native tribe, band, nation, pueblo, village, or community that the Secretary of the Interior acknowledges to exist as an Indian tribe pursuant to Public Law No. 103-454, 108 Stat. 4791, and "Indian" refers to a member of such an Indian tribe; and

(iii) "Sacred site" means any specific, discrete, narrowly delineated location on Federal land that is identified by an Indian tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion; provided that the tribe or appropriately authoritative representative of an Indian religion has informed the agency of the existence of such a site.

Sec. 2. Procedures. (a) Each executive branch agency with statutory or administrative responsibility for the management of Federal lands shall, as appropriate, promptly implement procedures for the purposes of carrying out the provisions of section 1 of this order, including, where practicable and appropriate, procedures to ensure reasonable notice is provided of proposed actions or land management policies that may restrict future access to or ceremonial use of, or adversely affect the physical integrity of, sacred sites. In all actions pursuant to this section, agencies shall comply with the Executive memorandum of April 29, 1994, "Government-to-Government Relations with Native American Tribal Governments."

more

(OVER)

14 (continued)

(b) Within 1 year of the effective date of this order, the head of each executive branch agency with statutory or administrative responsibility for the management of Federal lands shall report to the President, through the Assistant to the President for Domestic Policy, on the implementation of this order. Such reports shall address, among other things, (i) any changes necessary to accommodate access to and ceremonial use of Indian sacred sites; (ii) any changes necessary to avoid adversely affecting the physical integrity of Indian sacred sites; and (iii) procedures implemented or proposed to facilitate consultation with appropriate Indian tribes and religious leaders and the expeditious resolution of disputes relating to agency action on Federal lands that may adversely affect access to, ceremonial use of, or the physical integrity of sacred sites.

Sec. 3. Nothing in this order shall be construed to require a taking of vested property interests. Nor shall this order be construed to impair enforceable rights to use of Federal lands that have been granted to third parties through final agency action. For purposes of this order, "agency action" has the same meaning as in the Administrative Procedure Act (5 U.S.C. 551(13)).

Sec. 4. This order is intended only to improve the internal management of the executive branch and is not intended to, nor does it, create any right, benefit, or trust responsibility, substantive or procedural, enforceable at law or equity by any party against the United States, its agencies, officers, or any person.

WILLIAM J. CLINTON

THE WHITE HOUSE,
May 24, 1996.

# # #

15

United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Arizona State Office
222 North Central Avenue
Phoenix, AZ 85004-2208

SLCAO
OFFICIAL FILE COPY
DEC 1 2 1996
00450 Tim 12/12/96

In reply refer to:
2800 (AZ931)

December 6, 1996

Mr. Anthony Morton
Department of Energy
Western Area Power Administration
P.O. Box 11606
Salt Lake City, UT 84147-0606

Dear Mr. Morton:

A Enclosed are comments from Bureau of Land Management's Kingman, Arizona, Farmington, New Mexico and Las Vegas, Nevada offices on the Navajo Transmission Project Draft Environmental Impact Statement dated September 1996.

B Thank you for the opportunity to review the document. If you have questions related to the attached comments, please contact Carol Kershaw (Arizona) at (602) 417-9235; Jerry Crockford (New Mexico) at (505) 599-6300; or Jackie Gratton (Nevada) at (702) 647-5054.

Sincerely,

Michael A. Ferguson

Michael A. Ferguson
Deputy State Director
Resources Division

Enclosure

A Formal comments were received from Bureau of Land Management's offices in Kingman, Arizona and Farmington, New Mexico, but formal comments were not received from the Las Vegas, Nevada office.

B No response is necessary.

15a

KINGMAN FILED OFFICE: NAVAJO TRANSMISSION PROJECT EIS COMMENTS.

To: Bill Wadsworth, Realty Specialist
From: Rebecca Peck, Wildlife Biologist
Date: November 19, 1996
Subject: Review: Navajo Transmission Project, Draft EIS, Sept. 1996.

NTP- EIS

A **pg.2-23** Table 2-3, Generic Mitigation: Please add a mitigation measure dealing with plant salvage and reclamation such as reseeding. A salvage plan is needed

B **pg.3-27** "Wildlife..." the Truxton Plain does not occur on the Northern 1 West (N1W) alternative. The statement about a movement corridor should be moved to page 3-29, "Wildlife..." to Northern 2 (N2) discussion.

C **pg. 4-14** Big Game: I think the discussion in this section is weak. The upgrading of the road from Fire Mountain road to the Colorado River cannot be considered a low impact. Portions of the existing ROW along Link 2060 are inaccessible to wheeled vehicles. This portion is approximately 2.25 miles in length and begins at the end of "Fire Mountain road" and extends to the Colorado River. Essentially 2.25 miles of unroaded moderate to high value bighorn habitat would be disturbed by the construction of the powerline along the N1W route. The EIS should specifically state that the road on Link 2060 from the end of Fire Mountain road (where it currently ends now) to the Colorado River will be closed to vehicular traffic following construction. The statement in the EIS is vague and leaves the reader not knowing where this closure would take place. I spoke with Bill Burke of the NPS about this and he seemed agreeable to this idea.

D **pg. 4-17** "Special Status Species" I spoke with Bill Burke of the NPS on October 29, 1996 and he stated that NPS has only one tortoise record from the Willow Beach area (near link 2040) and no record for the southern route (link 2060). He did say that the Mohave desert tortoise were present on both the southern route Link 2060 and the northern route, Link 2040, on the *Nevada* side of the river.

A Generic mitigation measure 4 (Table 2-3 page 2-23 in the DEIS) states that surface restoration will be completed where ground disturbance has occurred. This will be done in accordance with guidelines set forth by the land-managing agency and will include reseeding and revegetation. Prior to construction, a complete salvage plan will be developed and approved by the appropriate agencies. State regulations (i.e., the Arizona Native Plant Law and the Nevada Cactus and Yucca Law) will be followed. Other Federal and state regulations that deal with the inspection of seed mixtures to be used will be incorporated into that plan as well. This salvage plan cannot be developed effectively until design of the line has been completed for the proposed route and areas where disturbance will occur have been identified specifically.

B This is correct. Truxton Plain does not extend north to N1. This statement applies to N2. The correction is reflected in the FEIS (Table 2-1f).

C Western and DPA understand and agree with the need to minimize human intrusions into areas inhabited by desert bighorn sheep. Road closures are one way of reducing secondary impacts of increased human access. However, access will be needed to maintain the line and respond to emergency situations along the line. These activities require the use of heavy equipment that must be able to access the line. While helicopters can be used for some maintenance activities, literature and past experience indicate that helicopter fly-overs can result in significant impacts on bighorn sheep, particularly during the period shortly before to shortly after parturition. Western and DPA will agree to work with all parties to limit undesirable access to previously inaccessible areas, with the understanding that access to the line must be available for Western's use, when necessary.

D As noted in the DEIS, the Mojave population of desert tortoise is present along Link 2060 (page 4-15) and Link 2040 (page 4-17). Your clarification of the information provided by Lake Mead National Recreation Area is appreciated. It is our understanding that LMNRA prefers the southern route due to smaller tortoise populations and concerns about the river crossing.

15a (continued)

MEMORANDUM

To: Bill Wadsworth
From: Bruce Asbjorn
Date: November 4, 1996
Subject: Review of Draft EIS for the Navajo Transmission Project

E	**Page 3-49, Paragraph 6, last sentence** Reference is made to Kingman's Draft RMP. It's a final now, as of March 1995.	Your comment has been noted and the correction is reflected in the FEIS Table 2-1f.
F	**Page 3-50, Paragraph 3, 5th sentence** speaks of proposed acreage for the ACEC. It is official now.	Your comment has been noted and the correction is reflected in the FEIS Table 2-1f.
G	**Page 3-51, Paragraph 4** see statement for pg. 3-49.	Your comment has been noted and the correction is reflected in the FEIS Table 2-1f.
H	Remainder of document appears satisfactory.	Your comment has been noted.

MEMORANDUM

To: Bill Wadsworth
From: John Thompson
Date: October 2, 1996
Subject: NTP Draft EIS-Reply

I	**Page 3-40, last sentence**: Which says BLM will inventory mining claims along the route and inform claimants. The BLM can conduct the records search, but it is up to the proponent to perform whatever contact and negotiation which may be required. Also, the timing of when this contact will occur is important. Are they waiting until final decisions on routes have been made, and THEN enteraining mining claim conflicts. It would seem that this locks them into negaotiating with claimants just prior to construction, rather than allowing flexibility of avoiding claims altogether by realigment.	The statement in the DEIS is based on information from BLM representatives at the NTP Cooperating Agencies meeting in May 1996. Our understanding was that BLM would conduct the record search and make the initial contact with the claimants in the form of an information letter, and DPA would follow up with individual contacts and negotiation, if required. Western and DPA now understand that BLM would conduct the record search and DPA would be responsible for all contact with the claimants. Western and DPA also understand that, considering the fact that there is the potential for numerous small claims, the timing of the contacts and negotiation is important. Coordination with BLM would commence as soon as the location of the proposed transmission line alignment has been refined, but with adequate time to make adjustments in the alignment to avoid claims wherever possible. The correction is reflected in the FEIS Table 2-1f.

15a (continued)

KINGMAN FIELD OFFICE: NAVAJO TRANSMISSION PROJECT MITIGATION PLAN COMMENTS.

To: bwadswor
From: Paul Hobbs
Date: Thurs, Oct 31, 1996 10:45 am
Subject: NTP Mitigation Plan Sept.1996

I have evaluated the NTP Mitigation Plan, and have some comments.

Page 8, Table 2 Generic Mitigation

J	Item #8 An example of the construction contract(s) for the links crossing KFO (formerly KRA) should be available for review and comment. This is to clarify exactly what will be done regarding the protected plants in the construction pathway. It needs to be clarified what the process will be in the removal and salvage plan that will be part of the construction contract.	J	As stated on page 1 in the Mitigation Plan, "As the project progresses, Western Area Power Administration (Western) and Diné Power Authority (DPA) will coordinate with the applicable regulatory and/or land-managing agencies to refine data (if needed) and mitigation on a site- or area-specific basis in accordance with agency policies, guidelines, and requirements. The detailed mitigation will be incorporated into a plan for the development and implementation of the project...." Rather than change the Mitigation Plan of September 1996, we prefer to work in person with the responsible personnel from each agency to refine the mitigation and discuss agency-specific policy. The resulting plan will be incorporated into the construction, operation, and maintenance plan (COMP), which the construction contractor will be required to adhere to.
K	It needs to be clarified if the construction contract is connected to the surface restoration mitigation plan, which should involve reseeding the disturbed ground surfaces. If plant reseeding is not part of the mitigation plan, a complete and full explanation should be submitted why it is not.	K	Refer to the response to comment J above. Also, information regarding surface restoration and reseeding will be part of the COMP.
L	This additional clarification needs to be installed in the mitigation plan with full and complete detail regarding planting schedules, desired plant communities of seed mixes to be applied for the various links as they cross KFO, seeding rates, current cost per pound of pure live seed, cost per acre per pure live seed to be planted. Also, dollar cost amounts need to be calculated and committed to the guaranteed reclamation of the disturbed surface areas associated with the construction of the transmission line.	L	Refer to responses to comments J and K above. In addition, it is the responsibility of Western to ensure that mitigation action plans prepared for DOE projects, as required by DOE directive, are fully implemented. Western will take steps to complete mitigation and make information available to all interested parties. Regarding commitment to costs for guaranteeing reclamation, DPA and all parties will have to negotiate assurances.
M	**Page M-50 in Generic Mitigation Plan** On the bar graph for selective mitigation, item #13 for link 1980: Selectively remove vegetation. Have the bar graph filled in solid all the way across the page to include the Truxton Plains, Music Mtns., and Hualapai Valley. Protected plants will be salvaged along this link.	M	While we appreciate your input, the resolution of data is too broad at this time to make specific mitigation recommendations. Selective removal of vegetation does not preclude plant salvage. Site-specific mitigation will be discussed with the appropriate agency personnel as the COMP is developed. Refer to the response to comment J above.
N	**Page M-53 in Generic Mitigation Plan** On the bar graph for selective mitigation, item #13 for link 2006: Selectively remove vegetation. Have the bar graph filled in solid all the way across the page to include Hackberry/Antares area. Protected plants will be salvaged along this link.	N	Refer to the response to comment M above.
O	**Page M-54 in Generic Mitigation Plan**	O	Refer to the response to comment M above.

15a (continued)

O On the bar graph for selective mitigation, item #13 for link 2020: Selectively remove vegetation. Have the bar graph filled in solid all the way across the page to include Hualapai Valley. Protected plants will be salvaged along this link.

Page 1 of 3

Page M-55 in Generic Mitigation Plan

P On the bar graph for selective mitigation, item #13 for link 2040: Selectively remove vegetation. Have the bar graph filled in solid all the way across the page to include the Hualapai Valley, White Hills, Detrital Valley, and the Black Mtns., to the NPS administrative boundary. Protected plants will be salvaged along this link.

P Refer to the response to comment M above.

Page M-56 in Generic Mitigation Plan

Q On the bar graph for selective mitigation, item #13 for link 2060: Selectively remove vegetation. Have the bar graph filled in solid all the way across the page to include the Hualapai Valley, White Hills, Detrital Valley, and the Black Mtns., to the NPS administrative boundary. Protected plants will be salvaged along this link.

Q Refer to the response to comment M above.

To:	Bill Wadsworth
From:	Bruce Asbjorn
Date:	November 4, 1996
Subject:	Review of Mitigation Plan for Navajo Transmission Project

R **Table 4, M. Measure #1** The justification statement in the right-hand column is a good one, but the wording in the M. Measure itself (left column) could be different, in my opinion. To say that existing roads will not be improved only in instances where "soil and vegetation are particularly sensitive to disturbance" is wrong. The proponent should always strive to create the least amount of disturbance possible, regardless of resource sensitivity, for the reasons mentioned in the right-hand column.

R DPA and Western are committed to developing NTP in a manner that is compatible with the environment and minimizes surface disturbance. Where terrain allows, Western and DPA are willing to consider cross-country travel along designated paths to minimize ground disturbance. However, where terrain does not accommodate cross-country travel, access roads, needed for construction and long term as well as emergency maintenance, must be designed and constructed for safe passage of large construction and maintenance vehicles. The travel surface of access roads generally would be limited to only 12 feet wide (DEIS, page 2-22), less than this width begins to jeopardize safety and efficiency of travel. The intent of selective mitigation measure 1 is to commit to using segments of access road narrower than the 12 feet in areas where soils and vegetation are "particularly sensitive to disturbance." In context with the description of activities associated with construction and maintenance (pages 2-19 through 2-34) and other generic as well as selective mitigation measures, the wording of selective mitigation measure 1 is appropriate. Also, refer to the responses to comments J and U.

S **Table 4, M. Measure #9** In my comments following review of the first PDEIS for this project, I suggested the use of corten steel structures to attain the rusted finish that would blend in better with the dark geology of some areas. Please explain why this was not done.

S Western and DPA are willing to discuss and evaluate site-specific use of corten steel or other "dulled" metal finishes with each individual agency rather making a broad commitment . While it is true that the rusted appearance of corten steel would blend with dark geology in some areas, there are circumstances on this project where it may not be appropriate. Two examples follow. The majority of the proposed line would parallel existing transmission lines where we have recommended that new towers match existing towers (and spans); corten steel structures may create greater contrast adjacent to a grey structures. Also, much of the landscape is open, and corten steel structures skylined may contrast with the background more than grey structure. Refer to the response to comment J above.

T **Table 4** In my comments following review of the first PDEIS for this project, I suggested that the concrete footings/anchors needed to be darkened in some way to reduce the visual contrast. This subject does not appear to be addressed in the Mitigation Plan. For some areas, this mitigation would be appropriate.

T Western and DPA are willing to discuss and evaluate the use of darkened concrete footings and anchors with each individual agency rather than making a broad commitment. Refer to the response to comment J above.

15a (continued)

U	**Pages M-50 to M-56** Access levels and Selective Mitigation may need to be re-worked if consideration is given to the above input.	**U**	The access level and mitigation descriptions in the DEIS and Mitigation Plan are the result of iterative reviews since early in the project (1993) by the cooperating agencies, engineers, construction and maintenance personnel, and others. Rather than changing the wording of these measures at this time, Western and DPA prefer to address the issues on a site-specific basis as the COMP is developed. Refer to the response to comment J above.
	Page 2 of 3 **To:** Bill Wadsworth, Realty Specialist **From:** Rebecca Peck, Wildlife Biologist **Date:** November 19, 1996 **Subject:** Review: NTP Mitigation Plan, Sept. 1996 **NTP- Mitigation Plan**		
V	pg. 8 Table 2, Generic Mitigation: Where is the salvage and reclamation plan? There is no mitigation specifying salvage of plants or reclamation such as reseeding.	**V**	A specific salvage and reclamation plan is not included in the Mitigation Plan. At this time, the resolution of data is too broad to make specific mitigation recommendations. Site-specific mitigation (including a salvage and reclamation plan) will be discussed with the appropriate agency personnel as the COMP is developed. Refer to the response to comment J above.
W	pg. 9 Table 2, Generic Mitigation, #13. change to read...."All existing roads will be left in a condition equal to or better than their condition prior to the construction of the transmission line. except in instances where the landowner or land management agency requests the road to be closed or made impassable to wheeled vehicles.	**W**	Prior to any commitment to closing roads, Western and DPA will discuss the issue on a site-specific basis. Refer to the responses to comments J and U above.

15b

SLCAO
OFFICIAL FILE COPY
DEC 1 2 1996

IN REPLY REFER TO:
2800 (07600)

UNITED STATES DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT
FARMINGTON DISTRICT OFFICE
1235 La Plata Highway
Farmington, New Mexico 87401

DEC ~6 1996

Memorandum

To: Deputy State Director, Lands and Renewable, Arizona State Office, Phoenix, AZ (AZ930)

From: Assistant District Manager for Resources, Farmington District Office, NM (NM070)

Subject: Comments on Navajo Transmission Project Draft Environmental Impact Statement

A Attached are our comments on the Draft Environmental Impact Statement. Our route preference is the environmentally preferred Kaibito (K1) route. This is a "hard-copy" of the GroupWise version of this sent to Carol Kershaw on December 5, 1996. Please direct any questions you may have to Elizabeth Allison or Jerry Crockford at (505) 599-6300.

Robert Moore for Joel E. Farrell

1 Attachment

cc:Mr. Anthony C. Morton, Western Area Power Admin., Colorado River Storage Project,
Customer Service Center, P.O. Box 11606, Salt Lake City, UT 84147-0606

A Your comment has been noted.

15b (continued)

COMMENTS
NAVAJO TRANSMISSION PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT

General:4

B	1. When will Western Area Power Administration (Western) initiate Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS) on Threatened and Endangered (T&E) species? This is usually initiated early and concurrently with the preparation of an EIS. This approach is used because of the length of time usually required by USFWS to review the biological assessment, make a determination and reach an agreement with the agency on mitigation measures, and the need to address USFWS concerns about T&E species in the impact identification and analyses, and mitigation sections of an EIS.	B	It would not be prudent to begin the Biological Assessment (BA) and formal Section 7 consultation with the FWS until the final route for construction of the transmission line is selected. Western has communicated with FWS throughout the EIS process; however, they have declined to comment or otherwise actively participate until a BA is prepared. Special status species surveys along DPA's preferred route began in spring of 1997. The BA will incorporate these survey results.
C	2. Our comments on the second Preliminary DEIS questioning how the C1 route would be constructed to avoid approximately 1,000 T&E plants were not addressed in this DEIS. There is some field work that indicates that a number of Mancos Milk-vetch plants are located on the proposed GC-1 route. These need to be addressed throughout this document. Although T&E species plants were not observed along Link 100 (westerly from Shiprock Substation) of the Glen Canyon 1 (GC1) route, nearly 1,000 Mesa Verde cactus plants were found within the one-mile-wide study corridor of the Central 1 (C1) route (southerly from Shiprock substation). The mitigation for construction along Links 180 and 240 consists of the following: a) limiting the amount of new access; b) identification of plants; c) having a biologist on site before and during construction; d) placing towers to minimize impacts to plants; e) fencing or flagging of plants; and f) transplanting of individual plants. As presented in this DEIS, construction activities will not be performed any differently in this area occupied by the T&E species plants than they would in areas were there are no T&E species plants.	C	Populations of Mancos milk-vetch were mapped along Link 100 (Figure MV-5E in the DEIS map volume). Link 100 is part of three alternative routes, GC1, K1, and C2. The initial information regarding the location of this population was provided by the BLM. At the time the DEIS was completed, however, the current status of that population was unknown. In 1996, Ecosphere completed an addendum to the special status plant surveys they had conducted for Dames & Moore in the Hogback ACEC. This additional survey work was completed along two miles of Link 100 and resulted in locating 63 Mancos milkvetch plants around the north base of Tower 148-2 of the existing transmission line. Generic mitigation measure 20 states the following: "Mitigation measures developed during the consultation period under Section 7 of the Endangered Species Act (1974) will be adhered to as specified in the Biological Opinion of the U.S. Department of the Interior Fish & Wildlife Service..." The list of measures provided in your comment are not project-wide. For example, biological monitors will be on-site in areas where sensitive resources exist and where the land-managing agency has requested that a monitor be present. Items "d", "e", and "f" apply to special status species plants only and would not be implemented where no threatened and endangered species are present.
D	3. A T&E species survey was apparently not conducted on the 50-acre area identified for expansion of the Shiprock Substation. The only information provided is, "Known habitat for Mesa Verde cactus and several populations of this cactus are present in the vicinity" (page 3-27). The only analysis presented in the impacts section is, "Impacts on biological resources at the Shiprock (substation),...would be low" (page 4-13). Our comments on the second Preliminary DEIS , as to the possibility or feasibility of constructing a 50-acre substation in an area with T&E species plants, were not addressed in this DEIS. Impact identification and analysis, and mitigation, in the final EIS needs to address construction activities in an area with nearly 1,000 T&E plants and a 50-acre area that may have T&E plants. Section 7 consultation would determine the mitigation measures that would be permitted on those segments of the route that could affect T&E species.	D	Special status species surveys have been initiated along DPA's preferred route and alternative substation sites, including the proposed expansion at the Shiprock Substation. This information will be presented in the survey results and incorporated into the BA. Section 7 consultation will be initiated following completion of the BA.

15b (continued)

Specific:

Chapter 2.

	Comment		Response
E	1. Table 2-7: Tables or figures should be placed as close as possible to where the citation is in the text, usually on the next page or pages. Move Table 2-7 to follow Table 2-6 (page 2-39).	E	Typically Western does not revise and reprint a DEIS; rather, an abbreviated FEIS document is prepared that addresses substantive comments on the DEIS (40 CF 1502.9(b) and 1503.4(c)). In addition, this 11-inch by 17-inch table and other oversized graphics were specifically placed at the end of Chapter 2 for ease of review.
F	2. Page 2-27, paragraph 3: A T&E species survey would need to be performed for any staging near the Shiprock Substation unless it is located within the boundary of the presently authorized area.	F	A threatened and endangered species survey will be conducted for any staging area near the Shiprock Substation located outside of the authorized area. However, locations of staging areas have not been identified at this time.
G	3. Page 2-42, Decisions to Be Made: This section concerns the Record of Decision and not a description of the proposed action. It should be moved to a "process section" or deleted.	G	As stated in the response to comment D above, Western does not revise and reprint a DEIS; rather, an abbreviated FEIS document is prepared that addresses substantive comments on the DEIS (40 CFR 1502.9(b) and 1503.4(c)). This section will remain in its present location.
H	4. Table 2-7: Page numbers need to be put on this table, as well as the other oversized tables and figures in the document.	H	Refer to the response to comment G above.
I	5. Table 2-7, 1st page, Mitigation Measure 1 - Effectiveness: The sentence says, "...soil from accelerated erosion". Suggested changes in this sentence are to insert, "in areas with problem or fragile soils" between "upgrade" and "leaves" and delete "accelerated."	I	The mitigation descriptions are the result of iterative reviews since early in the project (1993) by the cooperating agencies, engineers, construction and maintenance personnel, and others. Rather than change the wording at this time, Western and DPA prefer to address the issues individually. In addition, "accelerated" as in "accelerated soil erosion" is an accepted and accurate technical term referring to the erosional process occurring faster than normal.
J	6. Table 2-7, 1st page, Mitigation Measure 2: Insert, "which will be maintained throughout the construction process" after "use easily visible flagging."	J	Refer to the response to comment I above. Also, we believe that the statement "construction traffic routes must be clearly marked" implies that routes will be marked during the period of construction activities.
K	7. Table 2-7, 1st page, Mitigation Measure 3: Change "additionally" that is in "...does not impact resource values additionally" to "significantly". - Rationale - Minor impacts (or significant impacts that are mitigated) would be additional but acceptable impacts or changes.	K	Refer to the response to comment I above.
L	8. Table 2-7, 2nd page, Mitigation Measure 6 (access roads): It may be impossible to locate access roads in Links 180 and 240 to avoid the nearly 1,000 T&E species plants. Other possible mitigation to avoid those special status plants need to be addressed.	L	Refer to the response to comment C above.
M	9. Table 2-7, 3rd page, Mitigation Measure 11 and 12 (helicopter placement of towers and clearing): Address whether helicopter placement of towers would be considered as part of the mitigation for avoiding and minimizing T&E plants in Links 180 and 240 (if C1 route is selected). If this is the case, identify special status plants as one of the components that will be mitigated with helicopter placement of towers.	M	Placement of towers by helicopter could be a mitigative measure to avoid impacts to a variety of resources including threatened plants. However, as the mitigation measure states, it will be dictated by field reviews for those resources and documented in the COMP.
N	10. Figure 2-12, Local Areas (b.):	N	Refer to the response to comment D above. Also, Figure S-8f reflects a change to include the Shiprock area in the local issue area.

15b (continued)

N	No information is presented about the 50-acre Shiprock Substation, particularly the mitigation of T&E species plants that may be present in the area of the proposed expansion of the Substation.		
	Chapter 3.		
O	1. Page 3-2, Climate, 2nd paragraph, last sentence: Delete the word "averages". Temperatures in Farmington, during the summer, are in the high 90s and low 100s.	O	Refer to the response to comment G above.
P	2. Page 3-21, Special Status Species, Figure MV-5E: The area proposed for the Shiprock Substation expansion (from the Substation to the beginning of the west inventory corridor) needs to be inventoried for special status plants. Information is needed in the FEIS as to whether there are T&E species plants in these areas.	P	Refer to the response to comment D above.
Q	3. Page 3-23, paragraph three, "Special Status Species," first sentence: Delete, "although the species have been known to be present there." Paragraph four: Change the paragraph to reflect the population of 63 *Astragalus humillimus* that was found on Link 100. This site is located in the NE1/4NE1/4, sec. 21, T. 30 N., R. 16 W., NMPM, near tower 148/2. This tower is constructed on an outcrop of sandstone approximately 50 meters in diameter. Most of the plants occur along the outer edge of this platform. If Link 100 were constructed south of the existing power lines, this population of plants could easily be avoided. If this route is chosen, the plants should be located, flagged, and monitored during construction. This is per an Addendum to the Final Assessment (survey performed on 11/27 and 12/2/96. The recommended mitigation for this population is as follows. Should the alternative corridor Link 100 be selected as the preferred route for the for the NTP, it is recommended that the alignment be situated south of the existing Link 100 to avoid the Mancos Milk-vetch population on the sandstone outcrop beneath Tower 148-2. Additionally, an environmental monitor should be present during the placement of tower structures in the vicinity of the known Mancos mil-vetch population. The sandstone outcrop where the Mancos milk-vetch population is should be considered an exclusion zone during construction and maintenance of the NTP. Should any additional Mancos milk-vetch plants abe found along Link 100 during construction of the NTP, construction activities should cease in the vicinity of the plants and the FDO/BLM should be contacted immediately.	Q	Refer to the response to comment C above. Your comment regarding the preferred mitigation is noted. Western and DPA have committed to locating towers to avoid sensitive resources if practicable (selective mitigation measure 6 on Table 2-7 in the DEIS). In this case, because the population is known, it is unlikely that Western and DPA will select that location as a preferred tower site.
R	4. Page 3-25, paragraph 3, sentence two: The sentence needs to be edited to include pertinent portions of the following. A population of 63 *Astragalus humillimus* was found on Link 100. This site is located in the NE1/4NE1/4, sec. 21, T. 30 N., R. 16 W., NMPM, near tower 148/2. This tower is constructed on an outcrop of sandstone approximately 50 meters in diameter. Most of the plants occur along the outer edge of this platform. If Link 100 were constructed south of the existing power lines, this population of plants could easily be avoided. If this route is chosen, the plants should be located, flagged, and monitored during construction. This is per an Addendum to the Final Assessment (survey performed on 11/27 and 12/2/96.	R	Refer to the response to comment C above.
S	5. Page 3-27, *Shiprock Substation*, 1st sentence: Change, "The existing substation is surrounded by The Hogback ACEC...". and Page 3-48, *Shiprock Substation*, 3rd sentence "The substation is surrounded by The Hogback ACEC..." to say, "The	S	The correction is reflected in the FEIS (Table 2-1f).

15b (continued)

S	Shiprock Substation is located within BLMs Hogback ACEC."		
T	6. Page 3-48, *Shiprock Substation*, 1st sentence: Change to read, "The Shiprock Substation is owned by Western, but the land on which the substation sits and surrounding land is administered by BLM.".	T	The correction is reflected in the FEIS (Table 2-1f).
U	7. Page 3-61, Visual Resources, 2nd paragraph, last sentence: The use of Figures 3-3 and 3-4 to illustrate the existing facilities that reduce the visual quality of the area being addressed should be clearly stated. This is probably the only way these Figures can be related to visual resource. If other visual resource information is indicated, it should be more clearly presented.	U	The statement on page 3-61 is a summary. Page 3-63, seventh paragraph, last sentence addresses this appropriately under the heading of Existing Visual Conditions. "Most of the land crossed by the alternatives exhibits visual conditions that have been locally modified primarily due to the presence of existing transmission lines paralleled by the alternative routes as shown on Figures 3-3 and 3-4."
	Chapter 4.		
V	1. The consequences chapter appears to be a shortened version of the presentation in the Preliminary DEIS. There needs to be enough information for the reader to be fully informed and potentially able to arrive at the same conclusion presented in the document (i.e. low, insignificant, minor, high, significant etc. impacts). Two examples of the type of narrative that is needed to provide the reader with enough information for them to make their own determination (correspond with the document), are presented below. a) Minor or insignificant impacts would occur with surface disturbing activities occurring on approximately 50 acres out of approximately 2,500 acres. b) The rehabilitation of an area by spreading stockpiled top soil over the disturbed area and reseeding the area with native grasses and shrubs, prior to the rainy season, is expected to result in approximately 11,000 acres being returned to a grassland/range site out of approximately 12,000 acres. Of the remaining 1,000 acres, 800 acres consist of sand stone outcrops and badlands soils and topography, which are relatively free of vegetation. There would be minor long-term impacts from this action. The *Grazing* section (page 4-22) should include information to guide the reader in assessing the impact of the proposed action on grazing. Besides stating the impact is low, moderate or high, provide quantities so the reader can make a determination of whether the impact is low, moderate or high.	V	The data associated with the evaluation of alternatives for the NTP are voluminous. The intent of the text in the DEIS is to characterize and summarize the impacts. The text is supported by a number of tables that quantify the data as your comment suggests. Disturbance related information can be found in Tables 2-1, 2-2, and 2-4. Acres of disturbance and occupation are summarized in Table 4-15. Resource inventory data are summarized in Tables 2-10 and 2-11. Impacts are summarized in Tables 2-12 and 2-13. Significant unavoidable adverse impacts for visual resources and traditional cultural places are summarized in Table 4-14. Your comment on grazing also has been noted. The reference to Table 2-4 on page 4-22, paragraph 3, should be Tables 2-11 and 2-12, which provide overall quantities of long-term disturbance to grazing. The correction is reflected in the FEIS Table 2-1f.
W	2. Page 4-2, Air Quality, Water Resources, Paleontological Resources, and Noise sections): Consider dropping these sections from the document unless they need to be considered on other parts of the proposed project. A negative declaration can be made, i.e., "The following resource elements or land uses are either not present or affected by the proposed action: air quality, water resources, paleontological resources, sound."	W	At various times throughout the process, other agencies have requested that this information be included.
X	3. Page 4-7, *Big Game*, 1st paragraph, last sentence: Change to read "...legal or illegal taking of big game.	X	The correction is reflected in the FEIS Table 2-1f.
Y	4. Page 4-7, *Big Game*, 2nd paragraph, 2nd sentence: Change to read "...could be overland if terrain is suitable".	Y	The correction is reflected in the FEIS Table 2-1f.

15b (continued)

Z	5. Page 4-7, *Big Game*, 2nd paragraph, 3rd sentence: Provide examples of how access would be restricted after construction.	Selective mitigation measure 4 (Table 2-7 in the DEIS), states that methods to restrict access will be determined with concurrence of the landowner or land-managing agency. These methods will be developed as a part of more detailed mitigation planning with the agencies prior to the construction.
AA	6. Page 4-11, Special Status Species paragraph: More work needs to be done on this section. Remove the sentence, "If avoidance is not possible, individual plants would be transplanted to adjacent habitat and a monitoring program would be implemented to determine the success of the transplant." or restate it to reflect that this decision would be made only by/in consultation with the USFWS. Remove the sentence, "Additionally, during the winter months Mesa Verde cactus that are no longer than one inch in diameter contract into the soil and cold withstand some surface activity." This may not be a true statement. Even testing the hypothesis would farther endanger an already threatened and endangered species plant.	Your comments are noted. Mitigation measures will be formalized in consultation with FWS and the land-managing agency. We know of two cases on the Navajo Nation where monitoring programs are in effect for transplanted populations of Mesa Verde cactus. It is likely that either FWS or the Navajo Nation would request that such a monitoring program be implemented. The statement regarding Mesa Verde cactus contracting into the ground was provided by a FWS botanist who is knowledgeable about this cactus. Your concern regarding this statement is noted.
BB	7. Page 4-13, Substation Alternatives, 1st sentence: Delete the sentence, "Impacts on biological resources at the Shiprock,...would be low." Provide the type and amount of impacts projected to occur at the Shiprock Substation expansion, and the type of mitigation and the extent mitigation will avoid or minimize impacts.	Refer to response to comment D above. The new area for this project at the Shiprock Substation would affect an additional 50 acres. A clearance for threatened and endangered species was completed for this area at the time of a previous construction project at the substation and additional surveys are not needed according to the BLM, Farmington (B. Wagener, personal communication, March 17, 1997).
CC	8. Page 4-22, Grazing, 1st paragraph, 3rd sentence: Verify that Table 2-4 the correct table referenced in this sentence. Table 2-4 is concerned with ground disturbance from access roads and not disturbance from project construction and operation.	The overall potential for disturbance to grazing from construction and operation of the transmission line is shown on Tables 2-10 and 2-11. The correction is reflected in the FEIS Table 2-1f.
DD	9. Page 4-22, Grazing, 1st paragraph, 4th sentence: Include "...and existing and new access road segments that would remain permanently for future activities required to service and maintain the line".	The correction of this statement is reflected in the FEIS Table 2-1f.
EE	10. Page 4-26, Substation Alternatives: Make changes in this paragraph to note there will be minimal grazing impacts from the Shiprock Substation expansion, i.e., the Shumway grazing allotment.	The sentence has been modified to state that impacts on land use (grazing) would be low at Shiprock (on the Shumway allotment), Honey Draw, Red Mesa, Coppermine, and Moenkopi substation sites. This correction is reflected in the FEIS Table 2-1f.
FF	11. Page 4-30 through 4-31, Work Camp and Material Yards: This information is part of the proposed action. Move this information into Chapter 2. The effects of the elements of the proposed project need to be included throughout the consequences chapter, as applicable.	Refer to the response to comment G above.
GG	12. Page 4-32, No-action Alternative, 2nd paragraph, last sentence: Clarify how NTUA will be able to use NTP to provide electrical service to homes and businesses since substations are required to reduce the 500 kV voltage to a suitable level for use by homes and businesses.	Refer to the response to Issue 2 in Chapter 1.
HH	13. Page 4-74, 1st paragraph, 1st sentence: Cumulative impacts are based on the amount or extent of new surface disturbing impacts from this project proposal with existing surface impacts. For this reason, the only components considered in the cumulative impacts section should be existing surface disturbances within the power line corridor and	Although there is no specific proposal for a transmission line, there is a potential for another line in the foreseeable future, and Western was encouraged by other agencies to address that potential in the cumulative effects section.

15b (continued)

HH	long-term surface disturbances projected to remain after the construction of this line. Remove all narrative from this section on the second 500 kV line and limit the narrative to address the cumulative impacts from the existing lines and the proposed NTP project.		
I I	14. Page 4-74, Cumulative Effects: The impacts and cumulative impacts sections are similar because the type and amount of impacts are neither identified nor discussed. Add information to assist the reader to determine what the cumulative effect would be from construction of the NTP project added to existing impacts within the power line corridor.	I I	Types of impacts are addressed on pages 4-76 through 4-79. Amounts of impacts cannot be specifically described since a transmission line project is not proposed at this time, and no specific project description exists. However, it may be assumed that the amount of impact would be similar to that described for NTP throughout the DEIS.
	Chapter 5.		
J J	1. Page 5-11, Environmental Justice: Move this section to Chapter 4 Environmental Consequences, Socioeconomic Section since it is concerned with the effects or impacts to "minority populations" and not Consultation and Coordination.	JJ	Refer to the response to comment G above. The issues associated with environmental justice were addressed through extensive consultation and public participation. The section will remain in its present location.
KK	2. Page 5-20 through 5-24: This section is not required. Omitting this section cuts out a few pages in the FEIS.	KK	The inclusion of a list of agencies, organizations, and persons to when copies of the DEIS were sent is recommended in 40 CFR 1052.10-(I). The section will remain. Also, refer to the response to comment G above.

16

MARCO CONTRACTING, INC.
ENGINEERS & CONTRACTORS

CIVIL & STRUCTURAL ENGINEERS
2009 WEST ACOMA BLVD
LAKE HAVASU CITY, AZ 86403

Telephone (520) 680-1312
Fax (520) 680-6370

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December 5, 1996

Mr. Anthony G. Morton
Western Area Power Administration
Colorado River Storage Project
Customer Service Center
P.O. Box 11606
Salt Lake City, Utah 84147-0606

Re: Draft EIS
Navajo Transmission Project

Dear Sir,

Enclosed is a Comment Statement for the above referenced project. These comments were prepared for the Mohave County Public Land Use Committee by Charles E. Martin, Chairman of the Business and Industry Subcomittee.

If you have any questions, please contact me at (520) 680-1312, Lake Havasu City, AZ 86403.

Sincerely,

Charles E. Martin, PE,RLS

CEM:rgf

cc: Mohave County Public Land Use Committee

16 (continued)

COMMENT FOR MOHAVE COUNTY PUBLIC LAND USE COMMITTEE FOR
DRAFT EIS _ NAVAJO POWER TRANSMISSION

Since Mohave County is located in the Western Area Alternatives.

A From a purely environmental consideration, it is obvious that the (NIW) alignment is the best because it follows an existing alignment.

B From a socioeconomic consideration, it is our opinion that future development in Mohave County will be along Route 66 east of Kingman and along I-40 east and west of Kingman.

It would appear that a future substation on (C2) east of Kingman would be very beneficial to the entire Kingman area to provide a major power source without having to overload or increase the size of the Transmission lines coming down the River Way Mead or Market place. This system would also boost power supplies for Flagstaff, Williams, and possible expansion in to Chino Valley/Prescott area.

C Based on land use, business and industry in Mohave County we would favor line (C2).

A Your comment has been noted.

B Your comment has been noted; see response to Issue 2 in Chapter 1.

C Your comment has been noted; however, as shown on Figure 2-10 of the DEIS and Figure S-7f of the FEIS, alternative route C2 is not located in Mohave County. Route C2, in the eastern area, crosses San Juan, Apache, Navajo, and Coconino counties.

17

BOB MILLER
Governor

STATE OF NEVADA

JOHN P. COMEAUX
Director

DEPARTMENT OF ADMINISTRATION
Capitol Complex
Carson City, Nevada 89710
Fax (702) 687-3983
(702) 687-4065

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December 10, 1996

Anthony G. Morton
Western Area Power Administration
Colorado River Storage Project
Customer Service Center
P.O. Box 11606
Salt Lake City, UT 84147-0606

Re: SAI NV# E1997-038 Project: DEIS -- Navajo Transmission Project

Dear Mr. Morton:

Enclosed is an additional comment from the Nevada Public Service Commission that was received after our previous letter to you. Please incorporate this comment into your decision making process. If you have any questions, please contact me, at (702) 687-6382, or Julie Butler, Clearinghouse Coordinator/SPOC, at (702) 687-6367.

Sincerely,

Terri Rodefer

Terri Rodefer, Environmental Advocate
Nevada State Clearinghouse

Enclosure

17a

BOB MILLER
Governor

STATE OF NEVADA
PUBLIC SERVICE COMMISSION OF NEVADA
Capitol Complex
727 Fairview Drive
Carson City, Nevada 89710
(702) 687-6007

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Secretary

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DEPT OF ADMINISTRATION
DIRECTOR'S OFFICE

December 5, 1996

Terri Rodefer
Nevada State Clearinghouse
Blasdel Building, Room 200
Carson City, NV 89710

RE: Navajo Transmission Project, Draft Environmental Impact Statement

Ms. Rodefer:

A The draft Environmental Impact Statement for this project properly notes at Table 1-2, page 1-17, the need for a permit from this Commission to construct the transmission line in Nevada. Filing requirements are outlined in Nevada Aministrative Code 703.415-428. A filing fee of $200 should be submitted with the original application and nine copies to Mr. Clayton Holstine, Commission Secretary, at the above address. Noticing requirements and the findings the Commission must make before issuing a permit to construct are found in the Utility Environmental Protection Act, Nevada Revised Statutes 704.820-900.

Questions on preparing and submitting an application should be directed to Mr. Tom Henderson at 702-687-6048.

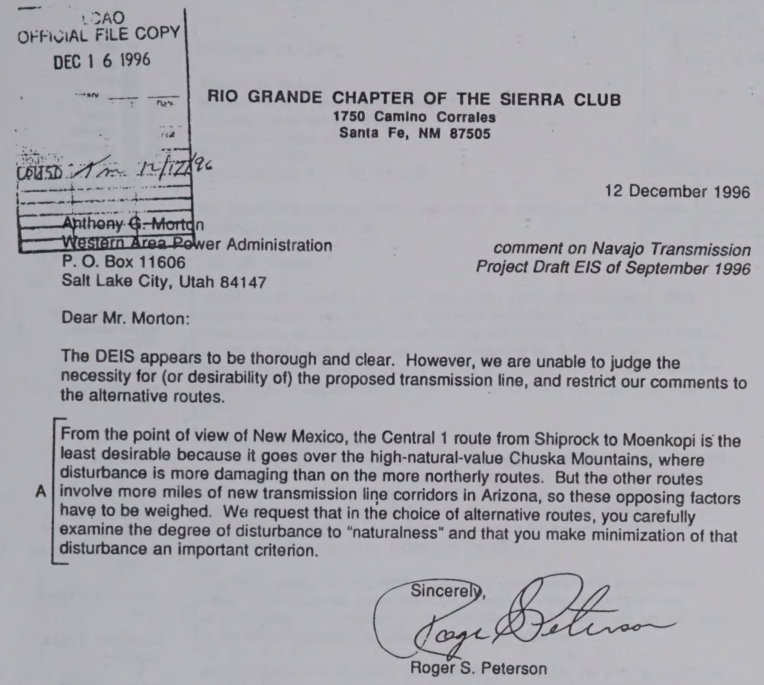
Sincerely,

Ann P Wilkinson
Ann P. Wilkinson
Assistant General Counsel

cc: John P. Comeaux, Dept. of Administration
Tom Henderson, Public Service Commission

A Your comment is noted. DPA will comply with the filing requirements as outlined in Nevada Administrative Code 703.415-428.

18



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CODED Tm 12/17/96

RIO GRANDE CHAPTER OF THE SIERRA CLUB
1750 Camino Corrales
Santa Fe, NM 87505

12 December 1996

Anthony G. Morton
Western Area Power Administration
P. O. Box 11606
Salt Lake City, Utah 84147

comment on Navajo Transmission Project Draft EIS of September 1996

Dear Mr. Morton:

The DEIS appears to be thorough and clear. However, we are unable to judge the necessity for (or desirability of) the proposed transmission line, and restrict our comments to the alternative routes.

A From the point of view of New Mexico, the Central 1 route from Shiprock to Moenkopi is the least desirable because it goes over the high-natural-value Chuska Mountains, where disturbance is more damaging than on the more northerly routes. But the other routes involve more miles of new transmission line corridors in Arizona, so these opposing factors have to be weighed. We request that in the choice of alternative routes, you carefully examine the degree of disturbance to "naturalness" and that you make minimization of that disturbance an important criterion.

Sincerely,

Roger Peterson

Roger S. Peterson

A The preferred route avoids crossing the Chuska Mountains. The crossing of the Chuska Mountains and the degree of disturbance caused by NTP were important factors in the identification of the environmentally preferred route. Refer to the DEIS, pages 2-39 through 2-41 for a summary discussion of the results of comparing the alternatives, and pages A-8 through A-17 for more detail regarding the comparison of alternative routes. These factors will continue to be considered by Western and DPA in the decision-making process.

19

"Managing and conserving natural, cultural, and recreational resources"

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1300 W. Washington
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85007
Tel: 602-542-4174
Fax: 602-542-4188
ttp://www.pr.state.az.us

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December 12, 1996

Anthony G. Morton
Western Area Power Administration
Colorado River Storage Project
Customer Service Center
P.O. Box 11606
Salt Lake City, UT 84147-0606

RE: Draft Environmental Impact Statement for the Navajo Transmission Project; DOE-WAPA et al.

Dear Mr. Morton:

A Thank you for providing us with a copy of the above draft document. With regard to cultural resources, the document provides an overview and assessments of sensitivity for the various alternatives, but I could not find a section in the lengthy document that summarized the Section 106 process to date. If the DEIS does not already summarize the Section 106 process and the status of the Programmatic Agreement (PA) for the project, please revise it to do so.

B What is the current status of the PA for this project? Our last correspondence from Dave Sabo, CRSP Manager, dated May 6, 1996, indicated that a final version of the PA would be sent out in a few weeks for signature--we have no record of having received this final draft. Please clarify this issue for us. Also, when will the cultural resource survey reports be available for review and comment? Again, these issues should be treated within the cultural resource sections of the DEIS.

C The DEIS contains much detail in reporting consultation with the relevant tribes; it would appear that a thorough attempt is being made to involve affected tribes in the review process for this project. However, we will defer to the tribes regarding the adequacy of this consultation.

We look forward to reviewing the final draft of the PA, the survey reports for the alternatives, and the revised EIS. We appreciate your continued cooperation with this office in complying with the historic preservation requirements for federal undertakings. If you have any questions or concerns, please contact me at 602/542-7138.

Sincerely,

Ann V. Howard

Ann Valdo Howard
Public Archaeology Programs Manager/Archaeologist
State Historic Preservation Office

cc:Mary Barger, Western

A Section 106 of the NHPA is mentioned on page 5-14; however, discussion of the Section 106 process and status of the programmatic agreement will be communicated separately from this NEPA document. The status of the programmatic agreement follows. On December 20, 1996, Western distributed the programmatic agreement for signatures to all parties, including the Arizona State Historic Preservation Office. Executing of this agreement will constitute compliance with Section 106 of the National Historic Preservation Act. The agreement will be implemented for this project.

B Because of the size of the project, intensive cultural resource inventory along a route selected for construction will be documented in a *series* of reports. Survey of the eastern portion of the project began in spring of 1997 and the initial report is scheduled for completion in late 1997 or early 1998. The plans and schedule for the cultural resources surveys and survey reports will be communicated separately from this NEPA document. The Arizona State Historic Preservation Office will be provided with draft reports for review as specified in the programmatic agreement.

C Your comment has been noted. Western and DPA will continue to work with the tribes affected by this project.

20

United States Department of the Interior

NATIONAL PARK SERVICE
Pacific West Field Area
Pacific Great Basin System Support Office
600 Harrison Street, Suite 600
San Francisco, California 94107-1372

IN REPLY REFER TO
L7619(PGSO-PP)

FEB 06 1997

Mr. Tony Morton
EIS Manager
Western Area Power Administration
CRSP CSC
257 East 200 South, Suite 275
P.O. Box 11606
Salt Lake City, Utah 84147-0606

Dear Mr. Morton:

Thank you for the opportunity to comment on the Navajo Transmission Project Mitigation Plan, hereafter referred to as the Plan. Please incorporate our comments in the revised Plan as well as the Final Environmental Impact Statement.

General Comments:

A The Diné Power Authority, a Navajo Nation Enterprise, has proposed to construct a 500 kilovolt transmission line that would pass through Lake Mead National Recreation Area (Lake Mead). As a result of the Salt River Project (1994), two 1600-foot transmission line right-of way corridors presently exist within Lake Mead and carry power lines to the Mead and Marketplace substations west of the park. When the Salt River power lines were constructed, Lake Mead and Salt River Project administrators cooperated in hiring a biologist to act as liaison between the National Park Service (NPS) and project contractors to resolve resource or habitat concerns that arose during construction. We propose a similar approach to the project now under consideration.

For this current project, Lake Mead will require the Diné Power Authority to hire an on-site biologist to oversee construction activities within the park. The biologist will be liaison between Lake Mead and the Diné Power Authority contractor for on-site resource problems that arise. The selection and hiring of the biologist must be approved by the National Park Service. This temporary position will be paid for by the Navajo Transmission Project. The biologist will only provide services during the construction phase and only for this project. It is estimated the funding requirement for the temporary biologist through this phase of the project will be $10,000. This figure is based on the expenditures for the biologist monitoring Salt River Project construction.

A Your comment has been noted. An on-site project biologist approved by the National Park Service (NPS) will be hired by DPA to oversee construction activities at the Lake Mead National Recreation Area (Lake Mead NRA).

20 (continued)

General Comments (continued)

B	The application of herbicides within Lake Mead is prohibited without advance NPS approval (standard NPS pest control request form attached). Therefore, any project related non-native plant eradication using herbicides within Lake Mead will require consultation with park staff with the eradication plan emphasizing manual removal of vegetation with provisions for advance surveys for cultural, historical and archeological artifacts.	B	Western and DPA will consult with NPS staff in preparation of the construction, operation, and maintenance plan (COMP) for NTP prior to construction. The COMP will include a vegetation management plan that will be approved prior to application of herbicides for non-native plants.
	Page Specific Comments: Impacts and Mitigation Measures Section Page M55 -SELECTIVE MITIGATION		
C	**Lines 1,2,3,4.** Mile 37 to 39, 41, 42 there is no indication that roads will be used or built. Overland routes should be used whenever possible if there are no existing roads. Where construction of spur roads to towers is necessary, they should follow landforms and cause minimal disturbance. Grade-and-fill road designs must be avoided to minimize disturbance. Is access by cranes to lift towers addressed when laying out spur road routes? When a spur road is built, rerouting for cranes or other large equipment will not be allowed off the spur road. Should the construction of a spur road be necessary the Inventory of Archeological and Historical Sites and Special Status Cultural Resources, Figure MV-14W, provided with the Draft EIS, should be consulted. This map identifies historical and cultural resources in the 1600-foot right-of-ways within Lake Mead. Also, Lake Mead staff need to be informed of such activities to provide input at the earliest stage during planning.	C	As indicated on page M-55 of the NTP Mitigation Plan, the crossing of the Lake Mead NRA along Link 2040 is in an area where existing roads (access level 1) would be used for construction and maintenance of NTP. Selective mitigation measures along Link 2040 include limiting the upgrade of these existing roads in areas that are environmentally sensitive (see Table 4, mitigation measure 1). If future engineering studies reveal that additional access is required, overland routes will be used wherever possible and construction of spur roads (if needed) will be accomplished in a manner that minimizes ground disturbance. Should new access roads be required, cultural surveys will be conducted to identify potential impacts and mitigation requirements. As stated on page 1 in the Mitigation Plan, "As the project progresses, Western and DPA will coordinate with the applicable regulatory and/or land-managing agencies to refine data (if needed) and mitigation on a site- or area-specific basis in accordance with agency policies, guidelines, and requirements. The detailed mitigation will be incorporated into a plan for the development and implementation of the project..." Rather than change the Mitigation Plan of September 1996, we prefer to work in person with the responsible personnel from each agency to refine the mitigation and discuss agency-specific policy. The resulting plant will be incorporated into the COMP, which the construction contractor will be required to adhere to.
D	**Line 10.** The canyon portion of this corridor, approximately mile 33 - 43, is lambing grounds for bighorn sheep. Construction activities will be curtailed from January 1 to March 15 in this section. Desert tortoise also inhabit this area, which is critical habitat for this species. As the Desert Tortoise is a Federally listed threatened species, individuals should be removed prior to construction and habitat restoration must be conducted following construction. These and additional required mitigations must be developed with U.S. Fish and Wildlife Service (USFWS) (Reference NTP-DEIS, 9/96, Affected Environment, p. 3-31).	D	As mentioned on page 3-31 of the DEIS, portions of the corridor along Link 2040 serve as lambing grounds for desert bighorn sheep. Construction in these areas will be curtailed seasonally between January 1 and March 15 as determined in conjunction with the states of Nevada and Arizona and Lake Mead NRA staff (mitigation measure 10). In addition, alternative Link 2040 also crosses critical habitat for the Mohave population of the desert tortoise (page 3-31). Surveys for desert tortoise will be conducted (as required) in this area and individuals removed prior to construction. Post-construction activities will include the restoration of habitat in this area. These and additional mitigation measures will be developed as a part of the COMP in conjunction with input from the Lake Mead NRA staff and FWS and other agencies as appropriate (e.g., BLM, Boulder City) as described in the response to comment C above.
E	**Line 13.** Within Lake Mead cactus and yucca plants will be removed from access corridors (spur roads, materials holding sites, etc.) and transplanted to adjacent sites to minimize total loss of these species; this will require advance consultation with Lake Mead staff.	E	Your comment has been noted. Prior to construction cactus and yucca plants will be moved from access corridors and transplanted based on consultation with Lake Mead staff as described in the response to comment C above.

20 (continued)

-RESIDUAL IMPACTS

F Line 11. Grazing - Livestock grazing is now prohibited on the Nevada side of Lake Mead along this corridor. Please change this line to reflect there is no grazing in the Nevada section of the park.

G Line 14. Parks, Preservation, Recreation - The table should show residual impacts within Lake Mead. Although mitigation is taking place, there will be lasting residual impacts to soils, plants, and recreation due to construction activities and the presence of the towers when the Project is completed (e.g. road construction, tower anchors). Also, this corridor is bordered by wilderness study areas on both sides. The Mitigation Plan, as well as the Final Environmental Impact Statement, should indicate the 1600-foot right-of-way bisects the wilderness study areas and address how associated impacts from the Navajo Transmission Project are resolved.

H Line 16. Views from Residences - The National Park Service agrees that the "dulled" metal finish on towers should reduce visual impacts caused by reflection. However, we question whether any of this corridor is visible from a residence within Lake Mead. Why are impacts to views from Lake Mead residences shown on this line?

Page M56
-SELECTIVE MITIGATION

I Lines 1,2,3. There is an existing construction/maintenance road along most of this corridor within the park. Line 1 (Use existing roads, limit upgrade) should identify all existing roads within 500 feet of the project site as they are options to building long spur roads. Line 2 (overland routes) may be appropriate to access tower sites rather than building spur roads. This would negate constructing new roads and minimize resource disturbance. However, the same requirements addressed for Mile 37-39, 41, 42, (see comments above for p. M55) apply to this segment also.

J Line 4. Any new access roads from the end of the existing approved roads to the Colorado River (approximately mile 34 - 35.5) will be closed after construction. The road prism must be restored to natural contours and the area revegetated, in consultation with Lake Mead staff. (Reference Navajo Transmission Project-Draft Environmental Impact Statement [NTP-DEIS], 9/96, Selective Mitigation, Table 2-7, #4)

K Line 13. Within Lake Mead cactus and yucca plants will be removed from access corridors (spur roads, materials holding sites, etc.) and transplanted to adjacent sites to minimize total loss of these species.

3

F Your comment has been noted and the correction is reflected in the FEIS Table 2-1f and the Mitigation Plan (page M-55).

G The statement on page 4-24 of the DEIS (second paragraph, last sentence) is "A designated utility corridor would be used for NTP through the Lake Mead NRA." To expand on that statement and the NTP Mitigation Plan, the 1,600-foot designated utility corridor is bordered on both sides by Wilderness Study Areas (WSAs). Impacts from construction and maintenance activities associated with NTP would be within the 1,600-foot designated utility corridor unless otherwise agreed upon with the NRA. By maintaining activities within the existing corridor, direct impacts on recreational facilities, interpretive sites, and the WSAs are avoided. However, as shown on page M-55 of the NTP Mitigation Plan, construction of NTP would result in low residual impacts on soils, vegetation, and views. Indirect impacts would include visual effects from the presence of the line; however, visual impacts would be minimized by using nonspecular conductors and dulled-metal structures, and matching structure types and spacing, which would reduce the visual contract of the new structures and conductors.

H As described under Visual Sensitivity on page 4-37 on the DEIS, low visual impacts can occur in those areas seldom seen or in background viewing areas. As discussed on pages 3-63 and 3-64, background viewing areas are located beyond three to five miles from the viewer, and seldom seen areas include those visible but beyond 15 miles. In order to acknowledge the potential for very long distance views from residences, minimum levels of low impact were assigned along the alternatives to account for these conditions. After further review of the visual inventory, it is agreed that the potential for visual impacts on the LMNRA to residential views is extremely limited. However, we believe that low impact levels should be retained in order to reflect the potential worst case condition.

I Where appropriate, the use of the existing access (construction/maintenance) road within the park and/or overland routes will be used to avoid the construction of long spur roads. A detailed inventory of existing access within 500 feet of the project site will be conducted in accordance with engineering and design studies for NTP. This information will be used to refine the location of access necessary for the construction and maintenance of the transmission line on the Lake Mead NRA. Appropriate mitigation measures required to address concerns will be developed in conjunction with Lake Mead NRA staff as described in the response to comment C above.

J At the request of the Lake Mead NRA, any new access roads from the end of the existing approved roads to the Colorado River will be closed after construction, and the road prism will be restored to natural contours and the area revegetated. As discussed in the response to comment C above, Western and DPA will consult with Lake Mead NRA staff in order to address these specific requests during the preparation of the COMP.

K Refer to the response to comment E above.

20 (continued)

-RESIDUAL IMPACTS

L **Line 6.** Special Status Plants - The only natural population of palo verde trees within Lake Mead are found on the Arizona side (approximately mile 29 - 35.5). This population has special management status. Every effort should be made to avoid damage to these trees and any loss must be ameliorated by revegetation funded by proponent with supervision by Lake Mead staff.

M **Line 8.** Special Status Wildlife - Mojave Desert Tortoise (a threatened species) are found on the Nevada portion of the park (approximately mile 36 - 40). The National Park Service requests to be included in developing mitigation measures developed for this species as part of the USFWS Section 7 survey necessary for preparing the Biological Opinion. (Reference NTP-DEIS, 9/96, Consultation and Coordination, Chapter 5, p. 5-14).

N **Line 11.** Grazing - Livestock grazing is now prohibited on the Nevada side of the Lake Mead along this corridor. Please change this line to reflect there is no grazing in the Nevada section of Lake Mead.

O **Line 14.** Parks, Preservation, and Recreation - The table should show residual impacts within Lake Mead. Although mitigation is taking place, there will be lasting residual impacts to soils, plants, and recreation within this unit of the National Park System. Also, this corridor is bordered by wilderness study area on the Arizona portion, south side. The Mitigation Plan, as well as the Draft Environmental Impact Statement, should indicate the 1600-foot right-of-way bisects the wilderness study areas and address how the associated impacts are resolved.

P **Line 16.** Views From Residences - We question whether any of this corridor is visible from a residence within Lake Mead. Why are impacts to views from residences shown on this line within Lake Mead?

If you have any further questions concerning these comments, or need additional information, please do not hesitate to contact Mr. Alan O'Neill, Superintendent, Lake Mead National Recreation Area at (702) 293-8920.

Sincerely,

Stanley T. Albright
Field Director, Pacific West Area

Enclosure

L This stand of paloverde trees was identified during the inventory phase of this project. If this stand is in proximity to the project, the stand will be avoided to the extent practicable. These trees typically do not grow to a height where they would interfere with human safety or line reliability. Should safety or reliability become an issue, consultation with NPS will precede any efforts made to trim or remove paloverde trees within the Lake Mead NRA as described in the response to comment C above.

M Western and DPA will coordinate with NPS in developing mitigation measures for the Mohave desert tortoise, found on the Nevada portion of the Lake Mead NRA, as part of Section 7 survey for the Biological Opinion. Refer to the response to comment C above.

N Refer to the response to comment F above.

O The statement on page 4-24 of the DEIS (second paragraph, last sentence) is "A designated utility corridor would be used for NTP through the Lake Mead NRA." To expand on that statement and the NTP Mitigation Plan, the 1,600-foot designated utility corridor is bordered on both sides by Wilderness Study Areas (WSAs). Impacts from construction and maintenance activities associated with NTP would be within the 1,600-foot designated utility corridor unless otherwise agreed upon with the NRA. By maintaining activities within the existing corridor, direct impacts on recreational facilities, interpretive sites, and the WSAs are avoided. However, as shown on page M-56 of the NTP Mitigation Plan, construction of NTP would result in low residual impacts on soils, vegetation, and views. Indirect impacts would include visual effects from the presence of the line and the potential for increased access as a result of upgrading the existing access or construction new access road. Visual impacts would be minimized by using nonspecular conductors and dulled-metal structures, and matching structure types and spacing, which would reduce the visual contrast of the new structures and conductors. Regarding access, as shown on page M-56 of the NTP Mitigation Plan, recommended selective mitigation includes use of overland routes or existing roads and limiting accessibility where roads are upgraded or constructed.

P Refer to the response to comment H above.

20 (continued)

cc:
Superintendent, Lake Mead, w/o enc
Chief, Environmental Quality Division, WASO, w/o enc
Coordinator, Stewardship and Partnership Team, CPCO, w/o enc
Field Solicitor, DOI-SF, w/o enc
Regional Environmental Officer, DOI-SF, w/o enc
Area Manager, Southern Nevada District, USFWS, w/o enc

20 (continued)

PARK Request________________________________ Date______

WRO-IPM Concurred________________________________ Date______

WRO- Secondary (if any)________________________ Date______

USDI NPS Western Region
Pest Control Request Form 10-21a
(Revised 4/93)

TARGET PEST: PLANTS , POST EMERGENT

PRODUCT NAME (MANUFACTURER): ROUNDUP (MONTSANO)

EPA REG. #: 524-308

ACTIVE INGREDIENT/S: GLYPHOSATE

% OR #/G ACTIVE INGREDIENT/S: 41%

MIX OF PRODUCT WITH DILUENT: 2 QTS / 100 GALLONS WATER

PRODUCT USAGE RATE: 2 QTS / ACRE

PRODUCT AMT. USED PER APPLICATION: 4 GALLONS

TREATMENT METHOD: TRUCK MOUNTED SPRAY BOOMS

FORM APPLIED: LIQUID

AREA OR UNITS TO BE TREATED: ROAD SHOULDERS ON HIGHWAY

# OF SITES: 1

SITE DESCRIPTION: HIGHWAY 299W, STATE ROUTE

# OF APPLICATIONS: 2

TOTAL AMT. PRODUCT TO BE USED: 8 GALLONS

WESTERN REGION/YEAR: 1995

NPS UNIT: WHISKEYTOWN

ORG. CODE: WHIS PROJ. #: WHIS513

PURPOSE: ROADSIDE MAINTENANCE

SEASON/PERIOD OF APPLICATION: WINTER - SPRING

AREAS TO BE AVOIDED: OCCUPIED USE SITES, WATER AREAS

AREAS TO BE TREATED WITH CAUTION: ALL OTHER AREAS

PRECAUTIONS: PERSONAL PROTECTION EQUIPMENT

TRAINING/CERTIFICATION STATUS OF PERSONNEL USED: STATE CERTIFIED APPLICATORS

MONITORING: CALIFORNIA DEPT. OF TRANSPORTATION

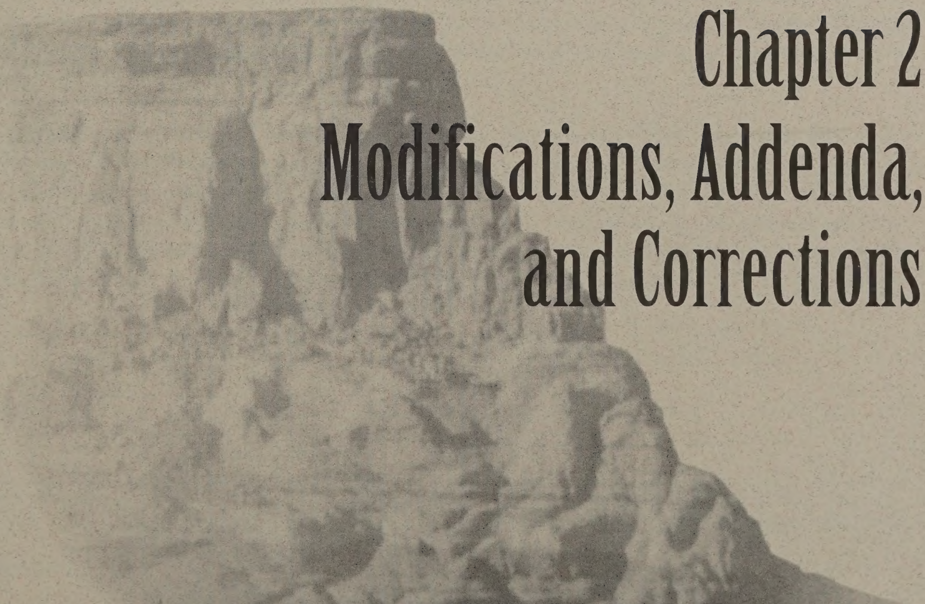
CONTACT PERSON/S: BUD IVEY 916/241-6584

PARK GMP ZONE: DEVELOPED AREA

LCS #:

XXX APPROVAL #:
(added by WR-RP, if any)

OTHER REMARKS: TO BE USED WITH OUST (WHIS402) AND BIVERT DURING FIRST APPLICATION. USED WITH BIVERT DURING SECOND APPLICATION. REQUESTED BY CALTRANS TO MAINTAIN VEGETATION FREE ZONE ALONG HIGHWAY FOR FIRE, SAFETY AND VISIBILITY.



Chapter 2

Modifications, Addenda, and Corrections

CHAPTER 2—MODIFICATIONS, ADDENDA, AND CORRECTIONS

Information in this chapter addresses modifications, addenda, and corrections to the EIS.

MODIFICATIONS

In March 1997, the Resources Committee and the Economic Development Committee of the Navajo Nation Council passed a resolution selecting the environmentally preferred alternative route to proceed with engineering, design, and other studies for the proposed transmission line. The committees thoroughly considered the results of the intensive environmental studies reported in the DEIS and the public's views expressed during the review of the DEIS. DPA is coordinating with Western to proceed with some of the more detailed plans and studies needed before the transmission line can be constructed. DPA recognizes the risk in proceeding with such plans and studies on the preferred route before the final decision is made. DPA understands that if the final decision on a route differs from the preferred route, DPA is responsible for revising the plans and studies accordingly.

While refining the location of the centerline along the preferred route, a segment of the preferred route from Dennehotso to Black Mesa was realigned. This modification to the project is addressed below. Other potential modifications resulting from detailed mitigation planning, right-of-way acquisition, or engineering design would be evaluated according to NEPA and tiered to this EIS, as appropriate.

Realignment Dennehotso to Black Mesa

In response to comments received from local land users regarding land use and visual impacts, a realignment of the eastern area preferred route (K1) between Dennehotso and Black Mesa was analyzed. Discussions with land users regarding the specific location of the preferred alternative in this area revealed that even though residences would not be directly affected, the proposed line would pass through areas of dispersed but common use—an undesirable location for local residents in the immediate vicinity of the route.

In order to respond to these concerns, meetings with land users in the vicinity of the route were conducted during the spring of 1997 to hear their suggestions regarding a realignment. Location of the realignment was verified in the field, and an environmental interdisciplinary comparison of the original alignment and realignment was conducted. Following is a brief description of the location of the realignment, affected environment crossed, environmental consequences of constructing along the realignment, a resource comparison between the original alignment and realignment, and a summary of overall routing preference.

Location

The realignment would replace portions of Links 501, 502, and 504 along K1. For purposes of characterizing and comparing the alternative segments, new link designations were given to the links of the original K1 alignment and new K1 alignment in this area. As shown on Figure 2-1f, the original segment was divided into Links 501a, 501b, 502, and 504. The realignment is designated by Links 501c and 501d.

The realignment varies from the original route in this area as it continues west near the junction of links 463 and 501 up to and across Red Point Mesa. As opposed to the original route (link 501a), the realignment (Link 501c) is located approximately 1.5 to 2.0 miles north and west of Link 501a before crossing back to the south of Link 501b and continuing west between Facing Red Points. As this alternative continues west toward Black Mesa, it is located approximately 1.0 to 2.0 miles south of Links 501b, 502, and 504. The original alignment was located north of the Burnt Trees Wash and closer to the town of Kayenta, whereas the realignment crosses Hallburn Ridge to the south as it climbs up to the northern edge of Black Mesa and joins with Link 504a on the K1 route.

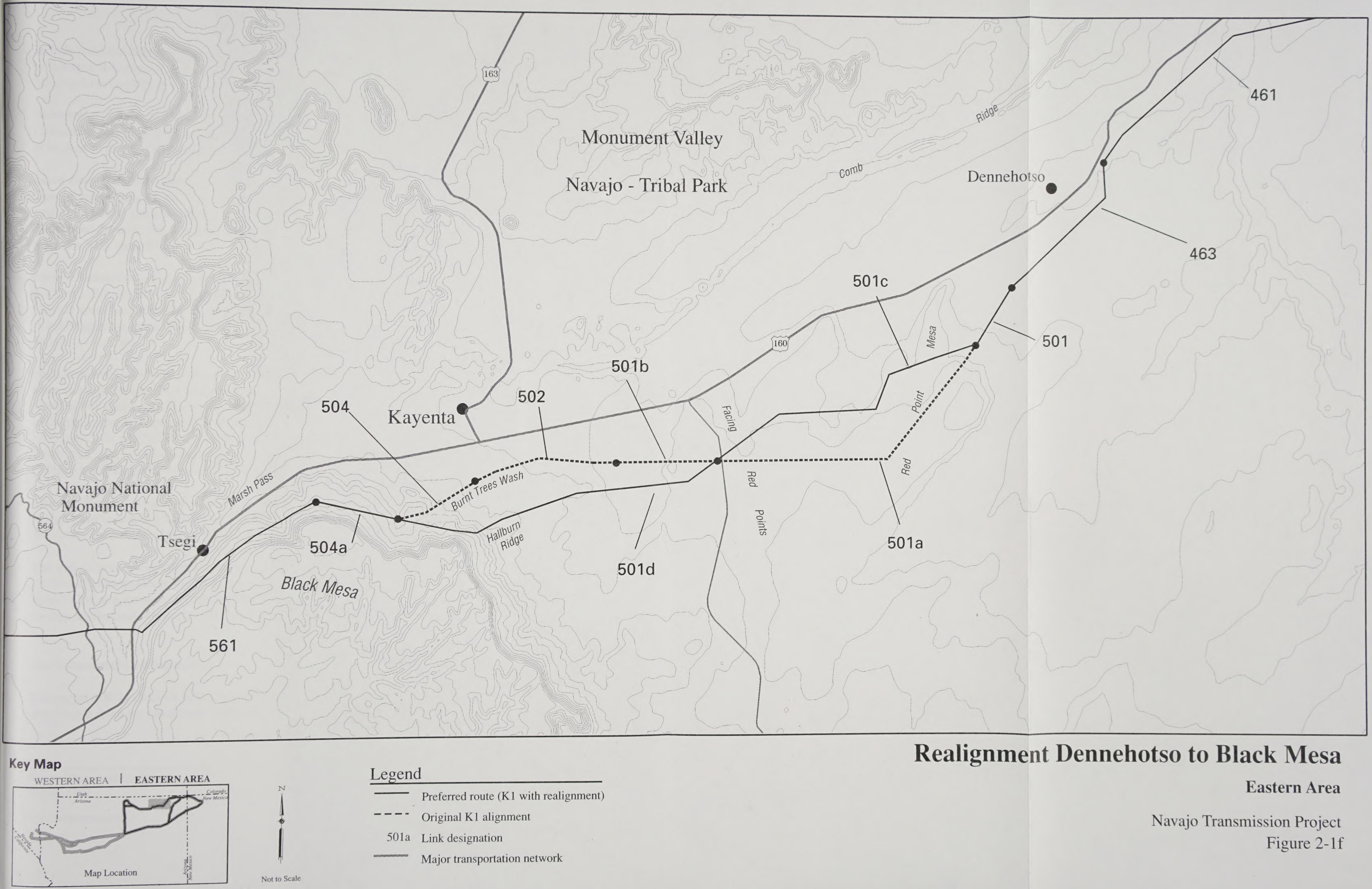
Affected Environment

This section provides a description of the environment that would be affected by the realignment, including a discussion on water, earth, and biological resources; land use; and visual and cultural resources. The realignment was characterized by using existing inventory data from earlier studies conducted for the DEIS supplemented by additional secondary data (as available). Specific land use information was refined further based on additional field and aerial reconnaissance conducted during April and May 1997. A description of the resources inventoried for the realignment follows.

Water Resources—Links 501c and 501d cross several washes; however, no 100-year floodplains have been delineated by the Federal Emergency Management Agency (FEMA) in this area. One spring is located along the northeastern flank of Black Mesa near the junction of Links 501d, 504, and 504a; however, it is more than 0.5 mile to the southwest of the realignment. There are no perennial streams crossed by or adjacent to this alignment.

Earth Resources—Links 501c and 501d both cross areas of soils that have erosion hazard potentials ranging from slight-and-moderate to high-to-severe. In particular, soils in the central portion of this area near the junction of Links 501c and 501d are subject to high-to-severe wind erosion. Soils on the steeper slopes of Black Mesa (western portion of Link 501d) are susceptible to severe water erosion potential.

Biological Resources—Vegetation types crossed by the realignment primarily consist of Great Basin desertscrub intermixed with Great Basin/Plains grasslands. Link 501d also crosses areas of piñon-juniper associated with the lower slopes of Black Mesa and upper Hallburn Ridge. Portions of Black Mesa also


163
160
564
Monument Valley
Navajo - Tribal Park
Comb
Ridge
Dennehotso
461
463
501c
501
Mesa
Point
Facing
Red
Red
Points
501b
502
504
Kayenta
Marsh Pass
Burnt Trees Wash
Hallburn Ridge
Navajo National Monument
Tsegi
504a
Black Mesa
561
501d
501a
Key Map
WESTERN AREA
EASTERN AREA
Utah
Arizona
Colorado
New Mexico
Nevada
California
Arizona
New Mexico
Map Location
N
Not to Scale
Legend
Preferred route (K1 with realignment)
Original K1 alignment
501a Link designation
Major transportation network

Realignment Dennehotso to Black Mesa

Eastern Area

Navajo Transmission Project
Figure 2-1f

include potential habitat for the Navajo sedge in steep cliff areas. No big game species were identified in this area; however, areas potentially supporting sensitive wildlife were identified in the vicinity of Link 501c (golden eagles) and the western portion of Link 501d (peregrine falcons nesting on Black Mesa).

Paleontological Resources—The realignment crosses various geologic units of the Triassic, Jurassic, and Cretaceous periods that have a high potential for significant fossils. The majority of link 501b, however, is located in areas of Quaternary-age deposits that are too young to contain significant fossils.

Land Use—The realignment is located entirely on the Navajo Nation and would cross portions of the Dennehotso, Chilchinbito, and Kayenta chapters within the Tuba City Agency. Lands crossed by the realignment are predominantly used for grazing, and residences are located in a dispersed pattern throughout the area. The realignment crosses Tribal Route 59 (local access to Kayenta) near the junction of Links 501c and 501d.

Visual Resources—Similar to the original alignment, the realignment does not parallel any existing utilities. The majority of lands crossed by the realignment are designated as Class C grasslands, with Class B areas located on the eroded terraces southeast of Kayenta (Link 501d). Small portions of Class A landscapes are crossed at the Red Point Mesa cliffs (Link 501c) and the Black Mesa escarpments (Link 501d).

High sensitivity viewpoints in this area consist primarily of dispersed rural residences with views that are open to partially screened, ranging from foreground to background areas. Portions of the realignment (Link 501d) also would be partially visible in the background from the Kayenta area. Roads with views to the realignment, considered moderate sensitivity, include U.S. Highway 160 and Navajo Tribal Route 59 (Links 501c and 501d). Middleground views from U.S. Highway 160 are open to partially screened south and east of Kayenta (Link 501d), and open foreground views would be present where the realignment crosses Navajo Tribal Route 59 southeast of Kayenta.

Cultural Resources—No special status cultural resources are located along the realignment. Most of the realignment is within a zone of moderate sensitivity; however, the eastern portion of Black Mesa (Link 501d) has been designated as high sensitivity.

The realignment is characterized as having a moderate sensitivity for Navajo traditional cultural places (TCPs). Approximately the eastern two-thirds of this alternative is rated as having low sensitivity for Hopi TCPs, and the western third is rated as high sensitivity because an eagle collection area, three eagle shrines, a clan trail, and religious use area have been identified in the vicinity.

Environmental Consequences

The purpose of this section is to describe the potential consequences, or impacts, on the environment that could result from the construction, operation, and maintenance of the proposed 500kV transmission line along the realignment. The descriptions that follow address the potential impacts on each resource previously described.

Water Resources—Potential impacts would be low. The realignment crosses areas of broad floodplains; however, these impacts would be mitigated by spanning the feature to the extent practicable and/or modifying the tower design, if needed. No perennial streams are crossed by the realignment, and though there is one spring near the junction of Links 501d and 504, it is located beyond the area where disturbance is anticipated for the construction of the NTP.

Earth Resources—Impacts on soils would be low. Both Links 501c and 501d cross limited areas of high-to-severe wind erosion potential; however, judiciously placing towers and minimizing the disturbance caused by access would effectively mitigate impacts. Construction in areas of steep slopes subject to high-to-severe water erosion (western portion of Link 501d) would be mitigated through the use of helicopters during construction.

Biological Resources—Impacts on vegetation, big game, and special status plant and animal species would be low. Disturbance to vegetation and habitat is expected to be minimal along the realignment, and the small areas of piñon-juniper that are crossed would be cleared selectively. Impacts on sensitive plants would be reduced by limiting ground disturbance associated with new access, and effects on raptors would be addressed through seasonal timing of construction activities.

Paleontological Resources—Overall impacts on paleontological resources would be low. Mitigation measures including minor design modifications such as shifting the location of a tower or access road, if needed, and the use of helicopters for construction in the vicinity of Black Mesa would effectively minimize ground disturbance to avoid direct effects. In those areas where fossils could not be avoided, research would be conducted prior to construction, and excavation of the fossils could result in beneficial impacts, as the fossils may be properly collected, catalogued, and studied.

Land Use—Impacts on existing and planned land use are anticipated to be low. There are no residences or associated structures that would be affected directly by the realignment, and no areas of planned development are crossed. Impacts on grazing would be minimal, as these activities within the right-of-way could continue, and disturbance to grazing from construction would be primarily short term.

Visual Resources—High impacts on scenic quality are expected to occur where the realignment crosses Class A landscapes at the Red Point Mesa cliffs (Link 501c) and the Black Mesa escarpment (Link 501d). Moderate impacts are anticipated to occur in the crossing of Class B landscapes on the eroded terraces south of Kayenta (Link 501d).

High impacts on residences with open foreground and middleground views are likely to occur along the realignment south and southeast of Kayenta (Links 501c and 501d) and along the southern edge of Kayenta (Link 501d). Moderate impacts would result from foreground and middleground views along U.S. Highway 160 near Black Mesa (Link 501d) and from foreground views at the crossing of Navajo Tribal Route 59 (Links 501c and 501d).

Mitigation measures to reduce visual impacts would include the use of nonspecular conductors, clearing vegetation in natural patterns (where appropriate), limiting construction of access roads, judicious placement of towers, and dulled metal finishes on towers.

Cultural Resources—No special status cultural resources would be affected by the realignment. Impacts on other archaeological and historical sites are projected to be low to moderate over most of the realignment, but could be high in the zones of high sensitivity at the western end of Link 501d. These high impacts would stem from development of new access that could result in not only direct impacts that have high potential for mitigation, but also long-term, indirect impacts that are much more difficult to mitigate. The use of helicopters to avoid development of new access in currently unroaded high sensitivity areas, however, is expected to eliminate the potential high impacts of the realignment in the vicinity of Black Mesa.

Impacts on Navajo and Hopi TCPs are projected to be low to moderate for the majority of the realignment, with small areas of high impact along the western two to three miles near Black Mesa (Link 501d). Potential measures to reduce impacts on TCPs include (1) shifting towers, (2) minimizing ground disturbance, (3) scheduling activities to avoid ceremonial activities, (4) designing and placing towers to minimize visual intrusions and so as to not negatively affect populations of raptors that are collected for traditional ritual purpose, and (5) involving customary land users in the detailed inventory and impact assessment of the realignment.

Resource Comparison

A comparison of the original alignment and realignment between Dennehotso and Black Mesa was conducted in May 1997 by an interdisciplinary team consisting of resource specialists who performed the review of both alignments. Following is a discussion, by resource, of the results from this review and a summary of the overall routing preference in this area.

Water, Earth, and Paleontological Resources—Overall impacts on these resources would be low for either the original alignment or the realignment. There is no substantial difference in the residual impacts between these alignments; however, the original alignment would be slightly preferred based on additional mitigation required for the realignment. This is due to the small amount of additional new access and helicopter construction required for realignment on the western portion of Link 501d on the eastern edge of Black Mesa.

Biological Resources—Impacts from either the original alignment or the realignment would be low. There is no substantial difference in the residual impacts between the two alignments; however, the original route would be slightly preferred based on additional mitigation required for the realignment. Construction of the realignment would require a small amount of additional new access, and helicopter construction on the eastern edge of Black Mesa (Link 501d). A small additional area on Link 501d also would require scheduling of construction to avoid potential effects on peregrine falcons during the breeding season in this area.

Land Use—Impacts on land use would be low along either the original alignment or the realignment. There is no substantial difference in the residual impacts between the alignments. The realignment (Links 501c and 501d) would require more mitigation of disturbance from access; however, this location is preferred as it responds to concerns expressed by local residents and would result in less disruption to common use areas identified during meetings with land users.

Visual Resources—Impacts on visual resources from either the original alignment or the realignment range from low to high; however, there is no substantial difference in the residual impacts between the two. In general, the realignment (Links 501c and 501d) would require more mitigation primarily because of the additional helicopter construction required along the eastern side of Black Mesa. The realignment is slightly preferred as it is located farther from sensitive viewpoints and has a greater potential for screening from Kayenta and U.S. Highway 160.

Cultural Resources—In general, impacts on cultural resources are anticipated to be moderate for either the original alignment or realignment in this area. The western end of both the original alignment (Link 504) and the realignment (Link 501d) are the most sensitive, and neither option avoids these zones. Because neither alternative exhibit any distinct differences, the original alignment and the realignment were considered to be equally preferred.

Routing Preference

The preference for the realignment between Dennehotso and Black Mesa is based on primarily considerations of land use and visual resources. Impacts on water, earth, and biological resources would be low for either the original alignment or realignment, and cultural resources would be similarly affected by either alignment. In meeting with local land users, impacts on the areas used commonly and views from residences were considered to be the most important criteria for NTP in this area. The realignment avoids commonly used areas identified by local residents and the transmission line would be placed in a manner that reduces the impacts on views from residences, especially in the vicinity of Kayenta.

ADDENDA

In this section, information is added to the EIS that was not included in the DEIS. The information includes a (1) floodplains and wetlands statement of findings, (2) statement regarding the potential for increased coal-generation and corresponding emissions, (3) change in status of the El Dorado Desert Tortoise Critical Habitat, (4) change in status of the Bennett Freeze area, and (5) disclosure statement for the consultant assisting Western in preparing the EIS.

Floodplains and Wetlands Statement of Findings

The regulations of the DOE, 10 CFR 1022 and Executive Orders 11988 and 11990, require Western to assess the impacts of its projects on floodplains and wetlands. Specifically, the regulations require that Western determine whether these regulations apply to the action proposed, and to prepare an assessment of the effects and alternatives for avoiding those effects. DOE intends this information for early public review. Western should then publish a statement of finding as part of the FEIS. The statement of findings should include a description of the project, an explanation of why the proposed action would involve floodplains, the alternatives considered, a statement of how the project conforms to state or local standards, and a description of the mitigation of effects.

A description of NTP is presented in earlier portions of this FEIS. A summary chapter provides an overview of the issues and process followed in developing the DEIS. The DEIS provided extensive information on the presence of floodplains (refer to DEIS pages 3-3 to 3-9) and the potential for impact (refer to DEIS pages 4-3 and 4-4). In support of the DEIS analysis, technical documentation on water resources addresses the data sources checked and information gathered. The documentation describes likely impacts from the project alternatives and mitigation measures developed for these impacts. The analysis of impacts on water resources focused on surface water since the climate of the project area is generally arid with low rainfall. Because of this, water resources are either perennial and intermittent streams, or springs and seeps. Based on the analysis, impacts on water resources in general were considered low.

The proposed action, as presented in the Summary of this FEIS, had several alternatives, but all would have similar impacts on floodplains and wetlands. This is because the proposed action is the construction of the high-voltage electrical transmission line of about 460 miles, from the Four Corners region to southeastern Nevada. A project of this type cannot avoid crossing major washes, streams, and rivers; for example, the project requires one crossing of the Colorado and San Juan rivers regardless of the alternative route selected. Therefore, Western found that no practicable alternative to locating in the floodplains/wetlands is available, consistent with the policy set forth in Executive Order 11988. Impacts on water resources could result from the construction or upgrading of access roads, structure-site preparation and structure installation, and stringing operations. These activities could affect erosion and deposition within the floodplain by changing flow patterns.

At this point in the project development, DPA and Western do not know specific information on the location of any of the transmission line structures. However, as evidenced by information in the DEIS and the responses to comments in this FEIS, it is the intention of DPA and Western to conform to all Federal, state, and local standards for floodplain protection. Once DPA determines the route and the engineering is complete enough to set actual placement of structures, DPA would apply for the permits required from the appropriate agencies. When the permitting processes are underway, requirements for obtaining applicable permits and approval would entail estimating impacts and addressing avoidance, protection, and mitigative measures.

As explained in the DEIS, there are two forms of mitigation measures—generic and selective. The first are those measures that have become standards of the industry and are normally used in any project. These generic mitigation measures for NTP are presented in the DEIS Table 2-3 on page 2-23. Those measures specific to impacts on water resources are measures 1, 2, 3, 4, 5, 13, 18, and 21. These are site-specific measures, selective for specific instances. In the planning process for this proposed project, Western has taken into account the most likely instances with the most likely measures needed for mitigation. Site-specific measures to reduce impacts on floodplains would include the following:

- floodplains less that 0.2 mile wide will be spanned with towers placed outside of the floodplain
- some floodplains more than 0.2 mile wide still may be spanned with a modification in the design of the structure
- within floodplains, no construction of access roads will be allowed; crews will use existing roads or travel overland to construction sites

Other measures may be called for by Federal or state agencies as the permitting processes move forward. As stated, DPA and Western have committed to avoiding or reducing impacts on these resources.

Air Quality

This section is an addendum to discussions in the DEIS regarding air quality.

The proposed project is for the transmission of electrical power, and generation of electrical power is not part of the project description. Specific discussion in Chapter 4 of the DEIS states that impacts on air quality would be limited to short-term, localized effects from construction-related activities. On pages 4-76 and 4-77, the DEIS discusses the cumulative effects on air quality of the proposed action. To summarize this discussion, there is excess electrical generating capacity at the plants already online in the Southwest, specifically San Juan, Four Corners, and Navajo generating stations. These plants currently are not producing at capacity because regional demand for electricity is less than the available existing generating capacity. However, it is important to point out in the context of this EIS that electrical utilities in certain markets, specifically southern California, would purchase the generation from these plants if sufficient transmission capacity existed. The construction of NTP would facilitate the marketing of additional power from these existing sources, electricity, having a path for additional capacity. The permits under which these plants operate assume they are generating at full capacity, and the effects of the emissions of the plants operating at capacity were studied at the time they were permitted. With NTP in place, the plants still would be operating within their existing permits for emissions.

However, comments during informal discussions and comments received from Land and Water Fund (letter 11, comment B, Table 1-4f, Chapter 1 of this FEIS) expressed concern that the net impact of NTP could substantially increase coal-fired generation and corresponding pollutant emissions in the region. This concern is addressed below.

Affected Environment

The Clean Air Act of 1970 (as amended) established geographic areas that share common air quality concerns known as air quality control regions (AQCR). The Act also directed the Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS). These standards represent the maximum permissible concentrations of certain air pollutants. The list of these "criteria" pollutants has changed over time and currently includes sulfur dioxide, nitrogen oxide, carbon monoxide, ozone, lead, and fine particulate matter (PM_{10}). These standards were set to protect human health and welfare. The air pollution emissions for which the electrical energy industry contributes substantial percentages of the man-made sources are sulfur dioxide, nitrogen oxide, and PM_{10}.

Nitrogen dioxide is of concern because of its contribution to urban "smog" and because when combined with water vapor, produces nitric acid, one of the components of "acid rain." Sulfur dioxide is of concern because it adversely affects the respiratory system, and when combined with moisture forms sulfuric acid, which is another constituent of acid rain. In this document, PM_{10} will be addressed qualitatively, because no relevant quantitative information was available on sources of this pollutant that was directly applicable to this EIS. PM_{10} is regulated because these particles are small enough to be respired deep into human lungs and are consequently a health concern. PM_{10} also is important in terms of adverse impact on visibility.

There is no NAAQS standard for carbon dioxide. However, it has been of concern recently because it is a "green house gas," which most scientists believe contributes to the phenomenon known as "global warming." This means that man-made additions to carbon dioxide in the atmosphere may, over time, increase the earth's average temperature.

The following describes the existing air quality condition within the region considering airborne emissions from existing and potential new electrical generators.

Recently, Western completed an EIS on its Salt Lake City Area Integrated Projects (SLCA/IP) electric power marketing program (Western Area Power Administration 1996). The EIS included a full analysis of existing air quality within a six-state region (New Mexico, Arizona, Nevada, Utah, Colorado, and Wyoming) and noted that the electric utility sector is a major contributor to the overall air pollutant emissions related to human activities within this study region. From the region's electric utilities, annual emissions of criteria pollutants sulfur dioxide and oxides of nitrogen represented approximately 49 percent and 56 percent, respectively, of the region's total human-related emissions of these pollutants in 1990. Also, it noted that annual emission of carbon dioxide from the electric utility sector accounted for 36 percent of the region's total human-related carbon dioxide emissions in 1990. The electric utility sector contributes only small fractions of the region's emissions of total suspended particulates (TSPs) and volatile organic compounds (VOCs).

The power marketing EIS noted that ambient air quality data from monitoring stations located within the six western states for 1987 to 1990 showed that, except for scattered industrial sites and the major cities, the air quality in the region is generally good. During this period and considering all sources, nitrogen dioxide and lead levels were substantially below the NAAQS, for all of the AQCRs, throughout the region. The sulfur dioxide NAAQS was exceeded at monitoring stations only in Hayden, Colorado and San Manuel, Arizona.

The six-state study region has a number of Federal Class I. These are areas for which EPA has determined that visibility is an important value. Visibility impairment is caused by light scattering and absorption by particulate matter and, to a lesser extent, nitrogen dioxide present in the lower atmosphere. The power marketing EIS noted that visibility in the six-state study region is currently the best in the contiguous United States, with the Four Corners region having a summer visual range of more than 120 miles. Furthermore, except for parts of Arizona, the remainder of the study region has summer visual ranges of more than 110 miles.

The total amount of airborne emissions from electric power plants in the six-state region has been estimated at 10,858,459 tons for sulfur dioxide and 11,075,527 tons for oxides of nitrogen over a 20-year period (Bureau of Reclamation 1992). If emissions were spread evenly over this 20-year period, sulfur dioxide and oxides of nitrogen would be produced by regional electric generators at the rate of 542,923 tons and 553,776 tons per year, respectively.

Environmental Consequences

This section examines the potential for incremental air quality effects that may result from increases in electrical generation that could occur as a result of the proposed action.

The intent of NTP is to facilitate the marketing of power from existing generation sources in the Southwest to the load centers in Arizona, southern Nevada, and southern California, not to enable development of new electrical generation. In particular, the NTP would relieve a bottleneck that exists in the transmission system serving the generating facilities in the Four Corners Area, which is periodically overtaxed by additional generation from power plants in Colorado and Wyoming.

It is true that the relief provided by the NTP could create a marketing opportunity for some additional electrical generation at plants that currently operate below full capacity during certain times of the year. Whether and where the current excess generating capacity would be used cannot be reliably forecast at the present time. For example, it is not known which electrical generators would have surplus power available for market, or what the mix of energy (e.g., fossil fuel, hydro, and/or nuclear) would be using the NTP line. Nor have specific utilities been identified as potential purchasers of the power generation that may be enabled by the NTP. Existing generating stations that would use the proposed NTP would be determined by both long-term power supply contracts and short-term power markets, which have not yet been implemented.

Given these circumstances, it is not possible to provide a reliable prediction of the additional capacity that may be used by existing generators as an indirect consequence of the proposed transmission project, or even to state with certainty that increases in generation would occur. With the uncertainty noted above regarding the mix of generating facilities that might benefit from additional transmission capacity, it is even more difficult to provide quantitative estimates of the corresponding incremental increases in the emissions of particular air pollutants. What can be stated is that emissions at some plants may be higher than their present levels during certain seasons, while emissions at other plants may decrease. However, since the participating utilities have not been determined, the development of meaningful quantitative estimates of emissions is not possible. Factors that should be considered in evaluating the potential significance of possible emission increases are listed below.

- The large fossil fuel power plants in the Southwest are currently permitted to operate at their maximum capacities, and are subject to permit conditions that limit their emissions to prescribed levels. Participation in the NTP would not enable any plant to exceed its currently permitted emission limits, which have been established to prevent violations of the National and state ambient air quality standards.

- These plants typically operate in a base-load mode whenever possible; that is, it would not be possible for emissions at a particular plant participating in NTP to increase above present levels, except during limited periods when excess capacity may exist.

- The existing plants have been or are intended to be retrofitted with pollution control equipment, which would help to offset the emissions from any increased generation that may occur. Additional generation from these plants, if it occurs, will be provided by units equipped with these controls.

- Even allowing for some margin of growth in overall electrical demand in the western United States, it is likely that increases in emissions that may be enabled by the NTP would be at least partially offset by decreases at plants that may have otherwise supplied the demand.

In summary, an indirect cumulative impact associated with the proposed NTP may be localized increases and decreases in pollutant emissions relative to current levels at the generating plants participating in the transmission project. While there is no firm basis on which to estimate the magnitude of these emissions changes, for the reasons stated above, it is unlikely that air quality in any locale would be affected in a manner that would result in violations of applicable ambient air quality standards.

References

Bureau of Reclamation. 1993. Power Systems Impacts of Potential Changes in Glen Canyon Power Plant Operations, Phase III Final Report. Prepared by the Power Resources Committee of the Glen Canyon Environmental Studies Office.

Western Area Power Administration. 1996. Salt Lake City Area Integrated Projects Electric Power Marketing Final Environmental Impact Statement. U.S. Department of Energy. DOE/EIS-0150.

Western Systems Coordinating Council. 1995. Ten-Year Coordinated Plan Summary 1995-2004.

El Dorado Desert Tortoise Critical Habitat

Portions of N1W, N2, and S2 in Nevada along Links 2200 and 2180 cross what has been referred to as the El Dorado Desert Tortoise Critical Habitat area designated by the FWS on lands administered by the BLM. While the NTP DEIS was being prepared, the BLM and city of Boulder City concluded an exchange of land within the critical habitat area. A portion of the land exchanged has been designated by the city as a conservation easement to continue protection of the desert tortoise (Boulder City, El Dorado Valley Transfer Area Conservation Easement). BLM and FWS have been negotiating to develop a BLM ACEC to protect remaining portions of the desert tortoise critical habitat area.

Bennett Freeze Area

Since the publication of the DEIS, progress on the land dispute case has progressed and resulted in an interim decision (District Court of Arizona, March 31, 1997) to lift the ban on development in certain areas of the Bennett Freeze area that are no longer in litigation. (Refer to Figure S-7f and the discussion of the Bennett Freeze on page S-18f.) Lifting of additional area is anticipated; however, at this time the interim decision does not provide a clear path for construction of NTP. Therefore, the proposal remains for NTP to connect into existing transmission lines through the proposed substation(s) in the Red Mesa area and wheel NTP power over the existing lines.

Disclosure Statement—Dames & Moore

DAMES & MOORE is not aware of any financial or other interest on the part of Dames & Moore in the outcome of the Navajo Transmission Project or the environmental impact statement related to the services being provided for this project.

Garlyn N. Bergdale, Principal
Environmental Services Group
Dames & Moore

CORRECTIONS

Table 2-1f contains a list of the corrections and changes to the DEIS.

TABLE 2-1f
CORRECTIONS TO THE DEIS

Page	Paragraph/ Table	Line	Correction
SUMMARY			
S-1	2	3	"and" should be "an"
S-4	2	2	Delete "(2) using a phase shifting transformer or transmission line compensation on existing paths," and change "(3)" to "(2)"
S-4	2	4	"(4)" should be "(3)"
S-4	2	6	"there is more capacity available than" should read "there is a greater demand for capacity than"
S-7	1	2	"Figures" should be "Tables"
S-7	2	10	Under "Eastern Area Alternatives": "(KB1)" should be "(K1)"
S-9	5	6	"(Colorado squawfish and razorback chub)" should be "(Colorado squawfish and razorback sucker)"
S-13	5	3	"Table 4-18" should be "Table 4-14"
TABLE OF CONTENTS			
i		2	"v" should be "vi"
v		26	Add "E-1 Major Utilities Paralleled and Crossed................ E-1" "E-2 Designated Utility Corridors on Federal Lands... E-7" "E-3 Land Jurisdictions Crossed................................ E-8" "E-4 Navajo Agencies and Chapters Crossed by NTP Alternative Routes.. E-12"
CHAPTER 1 - PURPOSE AND NEED			
1-8	Table 1-1		The Clark County, Nevada Management Framework Plan should be added to this table.
1-11	Table 1-2	Column 3, Row 3	"COE (and states); EPA on tribal lands" should be "COE (and states); EPA on tribal lands and in nondelegated States"
1-11	Table 1-2	Column 5, Row 3	"(33 USC 1344)" should be "(33 USC 1341)"
1-11	Table 1-2	Column 3, Row 4	Delete "EPA on tribal lands"

TABLE 2-1f
CORRECTIONS TO THE DEIS

Page	Paragraph/ Table	Line	Correction
CHAPTER 2 - ALTERNATIVES INCLUDING THE PROPOSED ACTION			
2-24	Table 2-3	Number 20	"Endangered Species Act (1974)" should be "Endangered Species Act (1973)"
2-37	Table 2-6	"Biological" row, line 8	"species plant" should be "plant species"
CHAPTER 3 - AFFECTED ENVIRONMENT			
3-19	2	2	"(Burt and Grossenheider 1976)" should be "(Burt and Grossenheider 1964)"
3-27	1	1	"The existing substation is surrounded by The Hogback ACEC" should read "The Shiprock Substation is within BLM's Hogback ACEC."
3-27	7	4	Delete "A movement corridor for pronghorn exists on the Truxton Plain."
3-28	6	4	"listed species, the Colorado squawfish" should be "listed species, the bonytail chub"
3-29	3	2	Delete "Pronghorn inhabit the Truxton Plains area (Link 1980)." Insert "A movement corridor for pronghorn exists on the Truxton Plains area (Link 1980)."
3-31	3	2	"for two listed species, the Colorado squawfish and razorback sucker" should be "for two listed species, the bonytail chub and razorback sucker"
3-39	1	2	"Table E-2" should be "Table E-1"
3-40	7	2	The last sentence should read "As soon as the location of the proposed transmission line alignment has been refined, BLM would conduct a records search of the mining claims along the route to identify the claimants, and DPA would be responsible for all contact with the claimants."
3-48	last	1	First sentence should read "The Shiprock Substation is owned by Western, but the land on which it is located and surrounding land is administered by BLM."
3-49	6	9	The last sentence of the paragraph should read "The BLM Kingman Resource Management Plan (1995) includes...."

TABLE 2-1f
CORRECTIONS TO THE DEIS

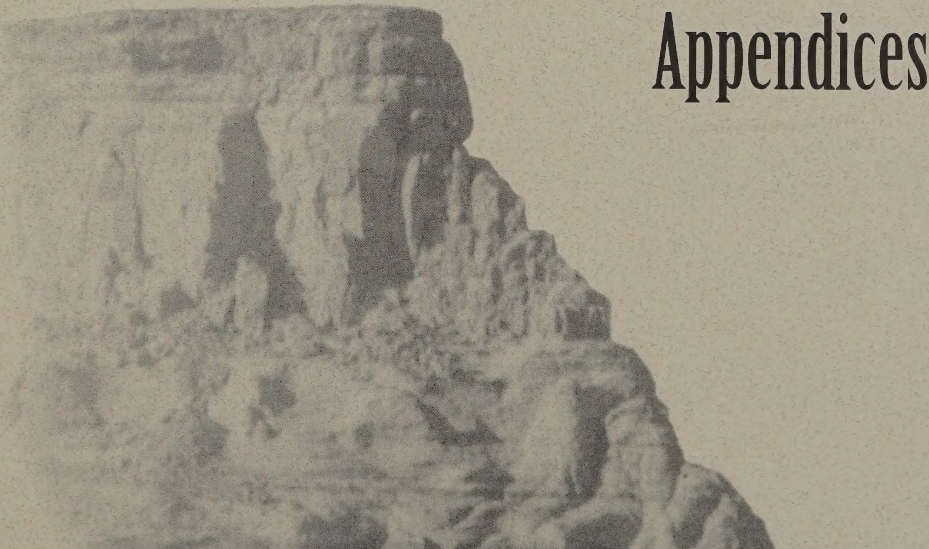
Page	Paragraph/ Table	Line	Correction
3-50	3	6	Fifth sentence of the paragraph should read "The ACEC provides habitat for special status wildlife and plants,.....
3-51	4	4	Fourth sentence should read the same as the correction for page 3-49, paragraph 3, line 6 above.
3-55	4	6	"Chapters 5 and 6" should be "Chapters 4 and 5"
CHAPTER 4 - ENVIRONMENTAL CONSEQUENCES			
4-7	4	8	"...the potential for harassment and legal take of big game" should be "...the potential for harassment and legal or illegal taking of big game"
4-7	5	2	"...travel could be overland" should be "...travel could be overland if terrain is suitable."
4-22	3	5	"Table 2-4" should be "Tables 2-11 and 2-12."
4-22	3	8	"...and new access roads that would remain permanently" should be "...and access roads that would remain permanently for future activities required to service and maintain the line"
4-26	3	1, 2	Replace the two sentences with "Impacts on land use (grazing) would be low at Shiprock (on the Shumway allotment), Honey Draw, Red Mesa, Coppermine, and Moenkopi substation sites."
4-53	1	2	"ICNIRP" should be "INRCIRPA"
4-53	1	2	"(NRPB 1993)" should be "(NRPB 1994)"
REFERENCES			
10			Add reference: Ecosphere. 1995. *A Survey for the Mesa Verde Cactus (Sclerocactus mesae-verdae) and the Mancos Milk-Vetch (Astragalus humillimus) Along Proposed Alternative Alignments of the Navajo Transmission Project.* Prepared for Bureau of Land Management, Farmington District Office, Farmington, New Mexico and Dames & Moore, Inc., Phoenix, AZ.

TABLE 2-1f
CORRECTIONS TO THE DEIS

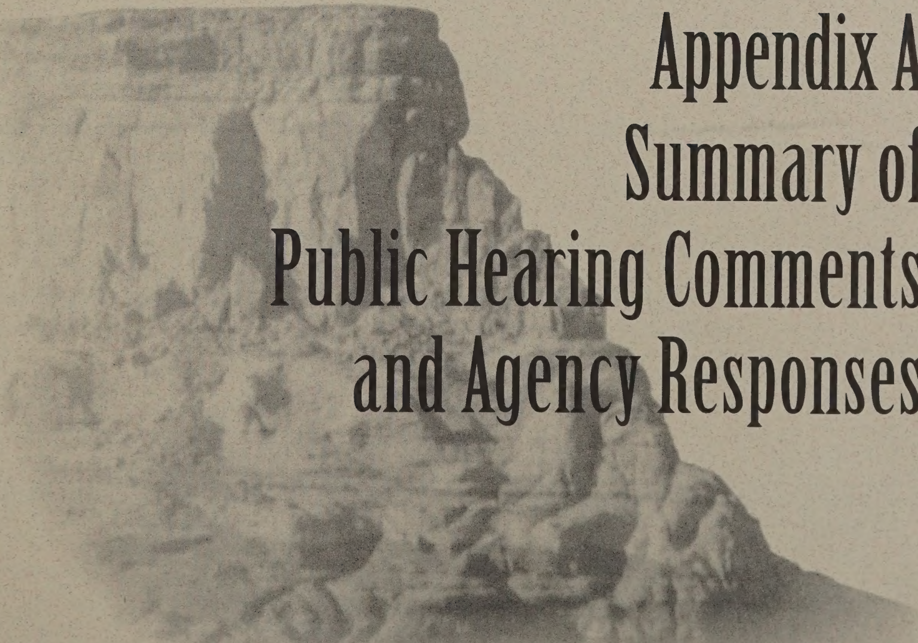
Page	Paragraph/ Table	Line	Correction
15			Add reference: McCoy, K. 1996. Personal communication with Kathleen McCoy, Wildlife Biologist, Navajo Fish and Wildlife Department.
48			Add reference: American Conference of Governmental Industrial Hygienists (ACGIH). 1995. *Threshold Limit Values for Chemical Substances and Physical Agents and Biological Exposure Indices.* American Conference of Governmental Industrial Hygienists, Cincinnati, OH.
48			Add reference: EPA. 1978. *Protective Noise Levels. Condensed Version of EPA Levels Document.* (No. PB82-138827) U.S. Environmental Protection Agency, Washington, D.C.
49			Add reference: Griffin, J. 1985. The Effects of ELF Electric and Magnetic Fields on Artificial Cardiac Pacemakers. In *Assessments and Viewpoints on the Biological and Human Health Effects of Extremely Low Frequency (ELF) Electromagnetic Fields.* American Institute of Biological Sciences Document AD/A156942, Washington, D.C.
49			Add reference: Keesey, J.C. and F.S. Letcher. 1969. *Minimum Thresholds for Physiological Responses to Flow of Alternating Electric Current Through the Human Body at Power-Transmission Frequencies.* (Report No. 1) Naval Medical Research Institute, Project MR 005.08-0030B, Bethesda, MD.
49			Add reference: National Radiological Protection Board (NRPB). 1994. Electromagnetic Fields and Cancer. Supplementary Report by the Advisory Group on Non-ionising Radiation. *Documents of the NRPB.* 5:79-81.
APPENDIX A - ROUTE SELECTION PROCESS			
A-1	1	5	"(shown in Figure 2-10)" should be "(shown in Figure 2-9)"

TABLE 2-1f
CORRECTIONS TO THE DEIS

Page	Paragraph/ Table	Line	Correction
APPENDIX D - BIOLOGICAL RESOURCES			
D-19	Table D-2b	Row 8, Column 2	"*Tadarida macrotis*" should be "*Tadarida brasiliensis*"
MAP VOLUME			
Map MV-8W			Livestock grazing is now prohibited within LMNRA on the Nevada side.



Appendices



Appendix A
Summary of Public Hearing Comments and Agency Responses

TABLE A-1f
LIST OF SPEAKERS AT THE PUBLIC HEARINGS

The following is a list of individuals who gave comments formally at the Federal public hearings. The date and location of each hearing are identified, and the individuals are listed in the order in which their comments were given at each location. Their comments are summarized from the hearing transcripts in Table A-2f and a response is provided for each comment.

OCTOBER 7, 1996

Sanostee Chapter (page A-7f)
- Christine Benally
- Albert Emerson
- Jerry Bodie, Council Delegate
- Harvey Begay
- Esther Yazzie
- Mr. Manygoats

Coalmine Mesa Chapter (page A-9f)
- Mr. Manygoats
- Frank John

Beclahbito Chapter (page A- 9f)
- Frank John, Chapter Official
- Lucy Bileen
- Edith Redhouse

OCTOBER 8, 1996

Teec Nos Pos (page A-10f)
- Lucy Bileen
- Edith Redhouse

Red Mesa Chapter (page A-11f)
- Louis Tapaha, Chapter Official
- Margaret Begay
- Betty Harvey
- Harrison Naakai, Chapter Vice President

OCTOBER 10, 1996

Sweet Water Chapter (page A-12f)
- No speakers

Mexican Water Chapter (page A-12f)
- No speakers

OCTOBER 14, 1996

Nenahnezad Chapter (page A-12f)
- No speakers

Whippoorwill Chapter (page A-13f)
- Peter Sage, Chapter President
- Elsie Begay

Farmington, New Mexico (page A-13f)
- Albert Emerson
- Marsha Austin

TaChee/Blue Gap Chapter (page A-15f)
- Tullie Dan
- Benjamin Manycows, Chapter Grazing Official
- Loretta Tullie

OCTOBER 15, 1996

San Juan Chapter (page A-16f)
- Robert C. Begay
- Charlie Benally
- Lula Benally
- Herbert Pioche, Council Delegate
- Jerome Benally, Grazing Representative

Hogback Chapter (page A-19f)
- Eva Benally
- Mary Buck
- Marie Yazzie
- Margaret Begay
- Betty Harvey
- Tonita Joe
- Suzy Dodge
- Alex Norris
- Marie Yazzie
- Irvin Keeswood, Council Delegate

Piñon Chapter (page A-18f)
- No speakers

Hard Rock Chapter (page A-24f)
- Lorenzo Madoni
- Elsie Begay
- David Herbert
- William C. Benward, District Region Committee Member
- Frances Altsisi
- John Benally
- Timothy Tso
- Thelma White

OCTOBER 16, 1996

Shiprock Chapter (page A-27f)
- Willson Phillips
- Vern Lee
- Peggy Garnenez, Farm Board Member

Cudeii Chapter (page A-29f)
- Harry Lee, Grazing Official
- Daniel Yazzie, Chapter President

Round Rock Chapter (page A-29f)
- No speakers

Rock Point Chapter (page A-30f)
- Frank W. Begay

OCTOBER 17, 1996

Red Valley Chapter (page A-31f)
- Albert Emerson
- Ruth Peshlegai
- Manson Harvey
- John Benally
- Phillip Harrison
- Willie Johnson, Chapter President

Chilchinbeto Chapter (page A-34f)
- Lee Gambler, Chapter President
- James Laughter, Chapter Official
- Suzie Yellowman
- Leroy Yazzie

Cove Chapter (page A-35f)
- Frank Yazzie
- Mary T. Manygoats
- James Sorrel Horse, Co-Chapter Secretary-Treasurer

Shonto Chapter (page A-37f)
- Jimmy Bryant
- Lieley M. Endischee
- Tom Laughter
- Billy Black
- Jimmy Bitsuie

OCTOBER 21, 1996

St. Michael's Chapter (page A-39f)
- Jimmy Bitsuie

Cameron Chapter (page A-40f)
- David Peshlakai
- "Charles"
- Grace Yellowmexican
- Ramona Charles

Chinle Chapter (page A-42f)
- Dwayne Billsie
- Theodore Evans

Bodaway Chapter (page A-43f)
- Riley Hoskey
- Lisa Haskey, Navajo Nation Official for Local Empowerment
- Evelyn Akathy
- Leonard Sloan

OCTOBER 22, 1996

Tselani/Cottonwood Springs Chapter (page A-44f)
- No speakers

Rough Rock Chapter (page A-47f)
- Pauline Bahe, Chapter Secretary

Tuba City Chapter (page A-45f)

- Clyde Goodman, ACC and IGC Committee Member with Inscription House Chapter
- Harry Goldtooth, Grazing Committee Chairperson
- Kee Walsh
- Leonard Viciente, Realty Speciality Supervisor for Real Estate Service House, BIA Navajo Agency

Tonalea Chapter (page A-47f)

- Ira Phillip
- Frank Betony
- Billy Reese Kee
- Loretta Luther
- Rose Phillip
- Felix Isaacs

OCTOBER 23, 1996

Many Farms Chapter (page A-51f)

- No speakers

Lukachukai Chapter (page A-55f)

- Herbert Pioche, Council Delegate
- Willeto Vicente
- Theresa Thompson
- Mr. Anderson
- Anselm Joe
- Emma Sandoval
- Francia Kinsel
- William Clemin
- Robert Lee
- Unknown speaker
- Edgar Clark
- Mr. Kinsel
- Alfred Barney, Chapter President
- Theresa Thompson
- Willie Davis
- Walter Sandoval
- Leonard Robbins, Environmental Services, BIA Navajo Agency Office

Inscription House Chapter (page A-52f)

- Mary Thompson
- Roy Tate
- Oliver Jordan
- Lena Manheimer, Chapter President
- Larry Hurley
- Rory Tomasio
- Tullie Hurley, Chapter President
- Mary Grisham
- Clyde Goodman, ACC and IGC Committee Member, Tuba City Chapter

Kaibito Chapter (page A-64f)

- Phillip Brown, Chapter Official
- Daniel Gishie
- Oze Begay
- Jean Gishie
- Keith Bennett
- Elsie T. Begay
- Daniel Gishie
- Archie M. Haskey
- Nina Yazzie
- Benny Begay

OCTOBER 24, 1996

Dennehotso Chapter (page A-70f)
- Alan Gray
- Katherine Tsosie
- Evvie Tsosie
- Kenny Thompson, Grazing Representative
- Beverly Thomas
- Tasha Arteen

Coppermine Chapter (page A-76f)
- No speakers

Kayenta Chapter (page A-75f)
- Martin L. Begay, Natural Resource Manager, Navajo Parks and Recreation
- Albert Bali, Planning, Kayenta Chapter

OCTOBER 25, 1996

Lechee Chapter (page A-76f)
- Denny Tsosie

OCTOBER 29, 1996

Flagstaff, Arizona (page A-77f)
- Unknown speaker
- Mike Macauley
- Anna Frazier, Diné Care
- Ivan Joe, Diné Care
- Mike Macauley

Peach Springs, Arizona (page A-82f)
- Edgar B. Walema, Vice Chairman, Hualapai Tribe
- Lena Bravo
- Monza Honga

OCTOBER 30, 1996

Dolan Springs, Arizona (page A-82f)
- Claude Thorpe, President, Dolan Springs Chamber of Commerce
- George Watson

Boulder City, Nevada (page A-83f)
- Bill Burke, Lake Mead National Recreation Area

JANUARY 9, 1997

Kykotsmovi, Arizona (page A-84f)
(The public hearing was before the Hopi Tribal Council.)

- Wayne Taylor, Vice Chairman
- Arnold Taylor, Manager, Hopi Tribe Department of Natural Resources
- Steve Youvella, First Mesa Council Representative
- Eugene Kaye, Hopi Tribal Council, Moenkopi
- Richard Nayatewa, First Mesa Representative
- Caleb Johnson, Council Representative
- Norman Hohnani
- Unknown Speaker
- Willard Sakiestewa, Treasurer, Hopi Tribe
- Tim Keevana, Administrative Manager, Village of Mishongovi
- Robert Sakiestewa, Jr., Governor of Upper Village
- Kurt Dongoske, Hopi Tribe Archaeologist

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Sanostee Chapter - October 7, 1996		
Christine Benally	A. Ms. Benally stated that although transmission lines cross reservation lands, few people receive electricity. The speaker also stated that while natural resources are taken from reservation lands (e.g., uranium from Crown Point, coal from Black Mesa) the resources are used to generate electricity for people off the reservation. B. Ms. Benally stated that there was potential for the generation of revenues and employment from the project.	A. See response to Issue 2 in FEIS Chapter 1 B. Ms. Benally's comments are correct.
Albert Emerson	A. Mr. Emerson expressed concern regarding the lack of jobs associated with this and similar projects (e.g., "station is computerized, not manned"). Mr. Emerson is looking for stability from the Tribe. B. At the time of the hearing, Mr. Emerson was unwilling to consent to the project.	A. See response to Issue 6 in FEIS Chapter 1 B. Comment noted
Jerry Bodie (Council Delegate)	A. Mr. Bodie expressed the need for informing land users and Navajo people in general so that they understand the elements of the project. B. The speaker also expressed the need for the Navajo people to receive the same benefits as Anglos. Mr. Bodie stated that this project on the Paragon Ranch was one of several projects in a 16-year planning stage and would facilitate development on the reservation.	A. See response to Issue 4 in FEIS Chapter 1 B. See response to Issues 1, 2, and 5 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Harvey Begay	A. Mr. Begay stated that not too many people had shown up for the public hearing because people did not get the right information. The speaker also noted that unlike past decisions made in Window Rock, this project sought community-level input and concerns from the people.	A. See response to Issue 4 in FEIS Chapter 1
	B. The speaker stated that there might be safety problems associated with the line and thunderstorms.	B. See response to Issue 3 in FEIS Chapter 1
	C. Mr. Begay also inquired as to the potential of the line to contaminate plant, mineral, and water resources.	C. As mentioned in the DEIS, pages 4-55 to 4-56, levels of electricity produced by NTP would be below that at which effects have been observed in crops. There is no evidence to conclude that the line would contaminate plant, mineral, or water resources.
	D. Finally, the speaker stated that natural resources (e.g., coal) and existing power lines (the line that crosses the Tsezhiin area) benefit other people, not the Navajo people.	D. See response to Issues 1, 2, and 5 in FEIS Chapter 1
Esther Yazzie	A. Ms. Yazzie stated that the lines are benefitting the Anglos and that the Navajo wanted the same benefits.	A. See response to Issues 1, 2, and 5 in FEIS Chapter 1
	B. Ms. Yazzie expressed the need for the understanding of the long-term effects of the project on the community and people's health. She stated that if the project was going to adversely affect their health then she would have to oppose the project.	B. See response to Issue 3 in FEIS Chapter 1
	C. The speaker also stated that people were having difficulty understanding the project because it was not translated/interpreted to the people correctly.	C. See response to Issue 4 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
Issue 3 - Health and Safety	Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
	Coalmine Mesa Chapter - October 7, 1996	
Mr. Manygoats	A. Mr. Manygoats explained that even though there may be some benefits associated with the line there is concern that electricity has "fumes" and that this "waste" goes beyond the lines and causes cancer. B. The speaker stated that negotiations for an existing line from the Page Park Plant only led to a one-time payment and that there is no plant (generation) or scholarships for the schools. C. Mr. Manygoats also stated that natural resources (e.g., coal) on reservation lands are being used for the benefit of people off the reservation. D. Additionally, the speaker explained that because nobody explained the project, there was a misunderstanding that the line would provide service to residences; the speaker believed that a provision for local service should be included as part of the project. Finally, the speaker explained that there were plans to move the chapter house "over there" (near the right-of-way) to take advantage of the proposed line.	A. See response to Issue 3 in FEIS Chapter 1 B. Comment noted C. Comment noted D. See response to Issues 2 and 4 in FEIS Chapter 1
	Beclahbito Chapter - October 7, 1996	
Frank John (Chapter Official)	A. Mr. John explained that people feel as though they don't have a say because the alternative routes are on the other side of the river (San Juan River), and hopes that if people accept the line on that side people in his community also will benefit. The speaker explained that although there may be indirect benefits, he doubts that those receiving electricity and monies on the West Coast will return the benefits to the Navajo Nation.	A. See response to Issues 1 and 4 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Frank John (Chapter Official) (continued)	B. Mr. John also stated that funds in Window Rock never reach the local people but are allocated to other Navajo Nation programs. Finally, the speaker explained that large-scale projects face political complications and red tape such that it's difficult to realize the benefits at the local level.	B. See response to Issue 1 in FEIS Chapter 1
	Teec Nos Pos Chapter - October 8, 1996	
Lucy Bileen	A. Ms. Bileen inquired as to how the existing Western line was negotiated and questioned why the Navajo Nation was not involved.	A. The existing 230kV transmission line was constructed by the Bureau of Reclamation, U.S. Department of the Interior, in the late 1960s. The Secretary of the Interior had the authority, under an Act of February 5, 1948 (62 Statute 17), to grant rights-of-way across American Indian lands. The grant of right-of-way could be made only with the consent of the proper tribal officials and payment of just compensation. The Navajo Nation received approximately $26,000 for the 125-foot-wide right-of-way in 1970. Western obtained the transmission line right-of-way when all electrical transmission facilities were transferred in 1977 from the Bureau of Reclamation to the newly created Department of Energy. NTUA has received 22 MW of power from the line annually for distribution from the Kayenta and Long House Valley substations. The 22 MW at a current rate of $21.72 per kilowatt year is equivalent to approximately $477,840.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
Issue 3 - Health and Safety	Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Lucy Bileen (continued)	B. The speaker also explained that because the lines are crossing the reservation, land users should be involved in the planning process in terms of providing input and receiving monetary compensation. C. Ms. Bileen stated that the western society has helped the Navajo Nation by way of conducting environmental impact studies, complying with the laws, and making proper decisions. The speaker believed that upon implementation the line would benefit those living in isolated areas.	B. See response to Issues 1, 4, and 5 in FEIS Chapter 1 C. See response to Issue 2 in FEIS Chapter 1
Edith Redhouse	A. Ms. Redhouse expressed concern for the low turnout at the hearing and that those gathered at the meeting may not be representative of the interests of the community; she indicated that more people would have attended if notices were sent out before the hearing. B. The speaker also stated that a lot of projects bypass "us" with benefits going to people in California.	A. See response to Issue 4 in FEIS Chapter 1 B. See response to Issue 1, 2, and 5 in FEIS Chapter 1
	Red Mesa Chapter - October 8, 1996	
Louis Tapaha (Chapter Official)	A. Mr. Tapaha's comments were in support of the project. B. He explained that there is the general perception that the project would generate revenues but also indicated that, like the western society, the Navajo Nation also would like electricity. C. The speaker also stated that, as he understands it, the proposed line is of greater strength than the existing lines. Mr. Tapaha explained that although the line poses some dangers, he believed that "they will be able to take care of it to where there is not a lot of emission coming from it."	A. Comment noted B. See response to Issues 1 and 2 in FEIS Chapter 1 C. See response to Issue 3 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Harrison Naakai (Chapter Vice President)	A. Mr. Naakai explained that Jerry Elwood (DPA) visited the chapter a week prior to the hearing, the time at which a resolution was provided to Mr. Elwood in support of the project.	A. Comment noted
	B. The speaker requested that people's and livestock's health and safety be taken into consideration.	B. See response to Issue 3 in FEIS Chapter 1
	C. Mr. Naakai also explained that ceremonial activities still take place on the lands and that these be taken into account during the development of the line.	C. As explained in the DEIS, cultural resources have been and will continue to be an important consideration. See DEIS Chapter 2, pages 2-35 to 2-42; Chapter 3, pages 3-76 to 3-92; Chapter 4 pages 4-58 to 4-74; Chapter 5; and Appendix A. Also, land users will be interviewed regarding important traditional places during the cultural resources field surveys and right-of-way acquisition process.
	D. Finally, the speaker explained that given the chance people would like the opportunity to benefit from the line in terms of local electrical distribution and funding of local chapters.	D. See response to Issues 1 and 2 in FEIS Chapter 1
Sweet Water Chapter - October 10, 1996		
No speakers		
Mexican Water Chapter - October 10, 1996		
No speakers		
Nenahnezad Chapter - October 14, 1996		
No speakers		

Key:

- Issue 1 - Distribution of Project Revenues
- Issue 2 - Local Electrical Benefits
- Issue 3 - Health and Safety
- Issue 4 - Public Planning Process
- Issue 5 - Right-of-way
- Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Whippoorwill Chapter - October 14, 1996		
Peter Sage (Chapter President)	A. Comments were in favor of the environmentally preferred route (K1). The speaker explained that he was aware of the public hearings held at other locations.	A. Comments noted
Elsie Begay	A. Ms. Begay expressed appreciation for notice of the public hearing and the chance to participate. She explained that no such opportunity was provided for the existing APS line and, as a result, claims to have lost benefits. B. The speaker supports the environmentally preferred route and opposes the central route based on concerns that there are many people, houses, and livestock in the power line area. Additionally, Ms. Begay stated that developing the central route would result in the Hopi Tribe making claims to the rights and benefits of the proposed line.	A. Comment noted B. Comment noted
Farmington, New Mexico - October 14, 1996		
Albert Emerson	A. Mr. Emerson inquired as to where the generation for the line would come from; he was under the impression that another plant would have to be developed.	A. As stated in the DEIS on page S-2, NTP would transfer electricity by using existing hydro and coal-fired generation in the Rocky Mountain area. The DEIS goes on to explain on page 2-2 that although new generation facilities could conceivably benefit the Navajo Nation, this alternative transmission technology would not remove current transmission system constraints. Further, new generation facilities would not accommodate seasonal or regional energy exchanges because there would still be inadequate transmission capability.

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
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Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Albert Emerson (continued)	B. The speaker explained that he was previously unaware that the line would be Navajo-owned with the line being rented/leased to utility companies; apparently this issue had been clarified for him. C. Mr. Emerson stated that the existing APS line was developed on his grazing lands without notification and questioned if he would be compensated if another line were to cross his grazing land. D. The speaker also questioned if there were going to be long-term employment opportunities as opposed to just short term as indicated on one of the displays ("Purpose and Need"). E. Mr. Emerson stated that every year the Navajo Council, NTUA, and Navajo Agricultural Products Industry (NAPI) are asking for money and always "behind the payment" and needing more money; Mr. Emerson questioned if money would be put back into the Navajo Tribe.	B. Comment noted C. See response to Issues 1 and 5 in FEIS Chapter 1 D. See response to Issue 6 in FEIS Chapter 1 E. See response to Issue 1 in FEIS Chapter 1
Martha Austin	A. Ms. Austin's comments were in opposition to the proposed line stating that she would "sure hate to have another transmission line going through." Ms. Austin resides and owns corrals under the existing lines in the Marsh Pass area along with several other people. The speaker indicated that she had just built a house in the area and that there is not a lot of space for another line there.	A. As explained on pages C1 to C2 of the DEIS, the preferred route is not located adjacent to the existing lines in Marsh Pass, but rather is situated to the south along the northern edge of Black Mesa.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Martha Austin (continued)	B. The speaker stated that when it snows or rains she can see "blue lights" and hear "awful sounds" coming from the existing lines.	B. As explained in the DEIS, pages 4-47 to 4-49 and 4-78 to 4-79, the sounds and visible effects to which Ms. Austin refers are an electrical byproduct of transmission lines known as "corona effects." Although corona-generated noise associated with NTP might be audible during wet-weather conditions (i.e., rain, snow, or fog), line noise generated from the project would be masked by naturally occurring sounds beyond the right-of-way. Corona-generated visible effects, appearing as a bluish glow or plume, on the conductors would be very minimal and visible only under the darkest of conditions.
	C. Ms. Austin indicated that her brother questioned as to why the hearing was conducted in Farmington off the reservation and not in Kayenta to make the hearing more accessible.	C. As explained in the DEIS on page 5-4, a total of 44 public hearings were conducted from September 1996 to January 1997, 37 of which were held on the Navajo Reservation. A hearing was conducted in Kayenta on October 24, 1996.
TaChee/Blue Gap Chapter - October 14, 1996		
Tullie Dan	A. Comments were in support of the environmentally preferred route stating the need for electricity for future generations.	A. See response to Issue 2 in FEIS Chapter 1
	B. The speaker explained that one day he hoped that the resource of electricity would be realized in the TaChee/Blue Gap area.	B. See response to Issue 2 in FEIS Chapter 1

Key:
- Issue 1 - Distribution of Project Revenues
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Benjamin Manycows (Chapter Grazing Official)	A. Mr. Manycows expressed concern for the safety of livestock on lands crossed by the existing power line stating that he had experienced mishaps in the past and therefore supported the environmentally preferred route as opposed to the central route. B. The speaker also stated that current problems with the Hopi Tribe would put additional constraints on the Navajo people should the central route be selected.	A. See response to Issue 3 in FEIS Chapter 1 B. Comments noted
Loretta Tullie (Chapter Secretary-Treasurer)	A. Ms. Tullie inquired as to whether or not the development of the environmentally preferred route would benefit the local chapter. The speaker indicated that she would support the environmentally preferred route if it would benefit the chapter in the long run. B. Ms. Tullie expressed concern that the central route may create more problems between the Navajo and Hopi tribes given the current land dispute.	A. See response to Issue 1 in FEIS Chapter 1 B. Comments noted
San Juan Chapter - October 15, 1996		
Robert C. Begay	A. Mr. Begay explained that having recently moved back onto the reservation (from Kirtland), he has noticed that electricity rates off the reservation were "20 to 30 percent" less expensive and was hoping that the addition of the proposed line would decrease monthly electric bills on the reservation. B. In relation to the above statement, it is his understanding that NTUA buys electricity from Farmington which in turn is distributed locally on the reservation.	A. As explained in the DEIS, pages S-2, 1-1, and 1-3, this project, as planned, is an investment development and would not provide electricity directly to the reservation. This project would not directly affect existing electricity rates. B. DPA and Western are not knowledgeable about NTUA's power-purchasing arrangements.

Key:

Issue 1 - Distribution of Project Revenues
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Charlie Benally	A. Mr. Benally stated that electric bills are too high and a plan for senior citizens needs to be established. B. The speaker favored the environmentally preferred route stating the need to avoid the Hopi Reservation, the need to keep the line out of more populated areas, the concern that the line may pose safety problems when subject to tornadoes and thunderstorms, and the potential adverse impacts to the health of humans and livestock. C. Mr. Benally also inquired as to whether or not the energy could be used to develop underground water resources due to the lack of rain in the area.	A. Although Mr. Benally's comment is respected, it cannot be addressed directly through this project. B. Comment noted. See response to Issue 3 in FEIS Chapter 1. C. This project would not be used directly to develop underground water resources.
Lula Benally	A. Ms. Benally supported the environmentally preferred alternative stating that it would cross less populated areas. B. She supported the comments provided by the previous speaker regarding potential ground water development and the need to decrease electric bills. C. The speaker questioned if there would be employment opportunities associated with this project stating that previous projects (e.g., the Navajo mine) have failed to provide jobs for the Navajo people.	A. Comment noted B. This project would not be used directly to develop underground water resources. C. See response to Issue 6 in FEIS Chapter 1
Herbert Pioche (Council Delegate)	A. Mr. Pioche stated that because the Navajo people and leaders don't educate themselves about these types of projects (reference was made to existing lines and mineral operations), they don't receive benefits. The speaker stated that although they have a lot of transmission lines crossing reservation lands and homes for distribution to southern California, the Navajo don't receive any monies.	A. See response to Issue 1 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues
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Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Herbert Pioche (Council Delegate) (continued)	B. Additionally, Mr. Pioche explained that while Anglos are permitted to use reservation lands Navajo people are the first to be laid off and that there are no agreements to keep them employed until the end of the project; he stated the need to negotiate terms for employment at the beginning and during the project process. C. Further, the speaker stated that people don't get enough electricity from NTUA, but this project would enable distribution of electricity to places in need over the life of the project. D. Finally, Mr. Pioche urged that birds, habitats, and, cost comparisons be considered in the selection of the preferred route.	B. See response to Issue 6 in FEIS Chapter 1 C. See response to Issue 2 in FEIS Chapter 1 D. Environmental and cost comparisons will be considered in the selection of a final preferred route.
Jerome Benally (Grazing Representative)	A. Mr. Benally's comments favored the environmentally preferred route stating that there are other pipelines, a coal mine, and many people living within the area of the central route. B. The speaker explained that revenues should be distributed to local chapters rather than Window Rock. C. Mr. Benally stated that livestock permittees should be compensated biyearly so that they can buy hay, feed, etc.	A. Comment noted B. See response to Issue 1 in FEIS Chapter 1 C. See response to Issues 1 and 5 in FEIS Chapter 1
	Piñon Chapter - October 15, 1996	
No speakers		

Key:

Issue 1 - Distribution of Project Revenues
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Hogback Chapter - October 15, 1996		
Eva Benally	A. Ms. Benally stated that there are two power lines in the area and people are using all the roads and not following the rules of enforcement; the speaker indicated that homes and property are being vandalized.	A. Ms. Benally's comment has been noted and the issue has been discussed further with Ms. Benally.
	B. In relation to the statement above, the speaker inquired as to whether or not the access roads are monitored.	B. Western's Shiprock-Page 230kV line and associated access roads are patrolled by air and ground each year; however, frequent regular monitoring of the access roads is not part of the proposed project.
	C. The speaker stated that she voiced her opposition to the project at the meeting last year on the grounds that grazing permittees never receive assistance and that they will not benefit as the Anglos do from the project in terms of receiving local electrical service.	C. See response to Issues 1 and 2 in FEIS Chapter 1
	D. Ms. Benally questioned as to why Anglos were presenting the materials to the Chapter and not Navajo officials, explaining that "they always put Anglos up front to shield themselves (Navajo)."	D. The information presented at public scoping meetings (1993), public information meetings (1995), and public hearings (1996-97), is associated with the Federal NEPA EIS process. Western is responsible for imparting information associated with the EIS. DPA has presented project information at numerous chapter meetings, grazing committee meetings independent of the EIS process. Also see response to Issue 4 in FEIS Chapter 1
	E. Summarily, the speaker stated that if "the project would benefit all my people, then it's fine. I still, I don't want the right-of-way compensation, I want the electricity."	E. See response to Issues 1, 2, and 5 in FEIS Chapter 1

Key:
- Issue 1 - Distribution of Project Revenues
- Issue 2 - Local Electrical Benefits
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Mary Buck	A. Ms. Buck explained that she wasn't familiar with how the project was going to be developed and that she was told that they won't receive any benefits. B. The speaker indicated that she has two homesites and a grazing permit in the area and that the land under the existing power line could be used. C. Ms. Buck explained that although she receives electricity she wouldn't mind not receiving it because it is too expensive. D. The speaker also stated that the effects of the emissions from the line on livestock should be a concern to grazing permittees. E. Finally, she explained that although it "seems like the proposed routes are already established," she wasn't opposing the line because she believed that the Navajo would benefit in some way.	A. See response to Issues 1, 2, and 5 in FEIS Chapter 1 B. Comment noted C. Comment noted D. See response to Issue 3 in FEIS Chapter 1 E. At the time of the public hearings, no decision about the final route had been made. Ms. Buck's comment about not opposing the line has been noted.
Marie Yazzie	A. Ms. Yazzie expressed the concern that the project was preapproved for the benefit of the people. B. She also explained that the process of eminent domain would be used to gain right-of-way access where opposition to the line existed. C. The speaker inquired about the effects of EMFs, expressing concern that it affects humans' safety and well-being. D. Ms. Yazzie also believed that this project, like others (e.g, oil extraction operations), would provide no money to the land users not directly affected by the line.	A. It is true that the intent of the project is to benefit the people. However, at the time of the public hearings, no decision about the final route had been made. B. DPA's objective is to negotiate with each affected land user. Only if a right-of-way agreement cannot be negotiated successfully would DPA request that the Navajo Nation exercise its right of eminent domain. C. See response to Issue 3 in FEIS Chapter 1 D. See response to Issues 1 and 5 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Margaret Begay	A. Ms. Begay stated that it is difficult to voice concerns because the land upon which they live and use is "Washington's land, federal land." B. The speaker inquired as to how the proposed line compares in size and voltage to the existing line. C. She also questioned if it is true that the emissions coming from the lines are harmful. Ms. Begay wanted to know if attempts are being made in Window Rock and Washington to make lines "safe and danger-free." The speaker stated that emissions (e.g., smog) produced from existing operations are causing adverse health effects. D. Ms. Begay indicated that her house had been burned down somewhere north of the chapter and that she was not permitted to water her livestock on her lands (no specific reason given). E. The speaker's comments were in support of the project stating that some people will receive compensation for the project.	A. Comment noted B. As explained in the DEIS, the existing line is 230kV and the proposed line is 500kV. C. See response to Issue 3 in FEIS Chapter 1 D. Comment noted E. Comment noted and see response to Issue 5 in FEIS Chapter 1
Betty Harvey	A. Ms. Harvey stated that she and her relatives reside and use the lands near the northern alternative routes. The speaker indicated that existing access roads leading towards her house are being used for partying, drinking, etc., and that enforcement of these roads has not been provided as stated. She explained that properties are vandalized and that her house was burned down approximately two years ago.	A. Ms. Harvey's comment has been noted and the issue has been discussed further with Ms. Harvey. However, as noted in the DEIS on pages 2-22 to 2-26, in certain areas it could be necessary to block access roads after construction to restrict future access for general and undesired use. Further, as pointed out in Table 2-7 (selective mitigation measure) in the DEIS, access roads would be closed, where needed, using varying methods (i.e., locking gates) to limit resource disturbance.

Key:

Issue 1 - Distribution of Project Revenues
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Betty Harvey (continued)	B. Ms. Begay indicated that there are stakes in the ground near her home and corrals and questioned if they represented the project right-of-way. C. Ms. Begay believed that the process of eminent domain may have already been preapproved. D. Finally, she believed that the revenues should go to the chapters.	B. No stakes have been placed in the ground that are associated with this project. C. At the time of the public hearings, no decision regarding a proposed route or right-of-way had been made. DPA's objective is to negotiate with each affected land user. Only if a right-of-way agreement cannot be negotiated successfully would DPA request that the Navajo Nation exercise its right of eminent domain. D. See response to Issue 1 in FEIS Chapter 1
Tonita Joe	A. Mr. Joe resides and holds a grazing permit somewhere near an existing line and explained that he can feel the magnetic fields during rainstorms. The speaker explained that his son was shocked through his metal bridle while riding his horse on the damp ground near the existing line and, as a result, was scared to graze his livestock under the line; he inquired about the health and safety effects of EMFs. B. Mr. Joe also explained that he is afraid to use his land due to the vandalism of properties in the area. C. Additionally, the speaker inquired as to why he didn't receive compensation for the use of the land next to his home for the existing line and if compensation would be provided for the proposed line. D. Mr. Joe had mixed emotions about the line but did want right-of-way compensation.	A. See response to Issue 4 in FEIS Chapter 1 B. Comment noted C. See response to Issue 5 in FEIS Chapter 1 D. Comment noted

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commenter	Comments	Response
Suzy Dodge	A. Ms. Dodge believed that the project was preapproved and that their comments would have no bearing on the outcome of the project due to eminent domain. B. The speaker explained that she was not compensated when the oil operation was developed and that she did not believe that she would be paid from this project. C. Ms. Dodge also expressed the need to keep the people involved in the process.	A. At the time of the public hearings, no decisions about the project had been made. B. See response to Issue 5 in FEIS Chapter 1 C. See response to Issue 4 in FEIS Chapter 1
Alex Norris	A. Mr. Norris resides somewhere near the existing coal mine and stated that the Navajo suffer at the expense of those living and using energy off the reservation (e.g., Los Angeles), stating that they have to breath the emissions (e.g., smog) that ultimately move from Los Angeles to the area in which they reside. B. The speaker explained that a contradiction exists in the DEIS in regards to explaining the effects of EMFs on humans. He explained that in one section the DEIS states "that EMF is so weak that you cannot feel it... and then you come over here and you said that scientists... has not determined" the effects on human lives. As an anology, Mr. Norris provided a description of a study that was conducted along the Los Angeles River, explaining that radiation was discovered in young people residing among power lines in that area.	A. Comment noted B. See response to Issue 3 in FEIS Chapter 1
Marie Yazzie	A. Ms. Yazzie inquired as to where the power line was going to be constructed and when the line would be expanded.	A. The alternative routes are shown on Figure 2-10 in the DEIS. The preferred route in the eastern portion of the project area is K1. Once the project is constructed, no expansion is expected.

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Irvin Keeswood (Council Delegate)	A. Mr. Keeswood stated that at the time of the hearing he would have to oppose the project because several questions have not been answered. Specifically, the speaker expressed that the issue regarding compensation for right-of-way needed to be clarified and that specific dollar amounts should be attached to each alternative route (costs and/or revenues.).	A. See response to Issue 5 in FEIS Chapter 1
	Hard Rock Chapter - October 15, 1996	
Lorenzo Madoni (Council Delegate)	A. The speaker indicated that at several previous meetings (e.g., chapter and "petty member counsel delegation" meetings) it was recommended that the line not go through the Hard Rock community but in the northern area. The speaker stated that the recommendation mentioned above was based on potential hazards to livestock and housing and the need to avoid the Hopi Reservation in order to develop the economic needs of the Navajo people.	A. Comments noted
Elsie Begay	A. Ms. Begay resides somewhere near an existing line and explained that there are hazards of running a power line near residences and livestock due to lightening. B. She opposes the central route stating that the Navajo need greater control of the land and rights-of-way and she doesn't want compensation going to the Hopi Tribe. C. The speaker indicated that she suppports the line going through the northern part of the reservation.	A. See response to Issue 3 in FEIS Chapter 1 B. Comment noted C. Comment noted

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
David Herbert	A. The speaker stated that if the line were to cross this area it would be challenged by many community members because there are a lot of burial sites along the central route in addition to concerns regarding water resources, livestock, and ceremonial activities. B. Mr. Herbert also expressed concern that if the line should go through the Hopi Reservation they may make additional claims; he believed that Navajo lands should be conserved for their own benefit.	A. Comment noted B. Comment noted
William C. Benward (District Region Committee Member)	A. Mr. Benward indicated that during previous chapter meetings held with DPA a vote was passed in opposition of the route going through the Hard Rock community. The speaker stated that the northern route should be supported stating that the opportunity shouldn't be given to the Hopi Tribe. Mr. Benward stated that it didn't appear that the Hard Rock community would benefit directly but, given the problems with money in Window Rock, the Navajo Tribe might benefit as a whole.	A. Comment noted
Frances Altsisi	A. Mr. Altsisi's comments were in support of the northern route but in opposition to the line going through the Hard Rock community due to potential hazards associated with lightning and impacts on people's health. B. The speaker indicated that the existing line was developed without the consent of the Navajo people. C. Mr. Altsisi also expressed concern that because the Hopi Tribe has challenged the Navajo Tribe on land claims, routing a line through the Hopi Reservation could result in the taking of Navajo lands needed for the future generations and livestock.	A. Comment noted; see response to Issue 3 in FEIS Chapter 1 B. Comment noted. See response to comment A of Lucy Bileen, Teec Nos Pos hearing on October 8, 1996 (FEIS page A-10f). C. Comment noted

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
John Benally	A. Mr. Benally questioned why the power was needed and how the line would benefit the people. He stated that although power lines exist there are no businesses on the reservation (e.g., laundromat, restaurant, gas station) and that for services (e.g., vehicle repair) they must go to Flagstaff, Winslow, and elsewhere.	A. See response to Issues 1 and 2 in FEIS Chapter 1
	B. He inquired who is involved in this project.	B. As stated on page S-1 of the DEIS, DPA, a Navajo Nation enterprise, is the proponent/sponsor of the project. Western is the lead Federal agency responsible for preparing the EIS.
	C. Mr. Benally stated that the line would be developed regardless of what was said at the meeting.	C. See response to Issue 4 in FEIS Chapter 1
	D. He stated that an alternative (e.g., solar) to electricity should be considered because he believed that in the end the project would result in environmental destruction.	D. As explained in the DEIS, page 2-1, a variety of alternatives to the proposed action (NTP) were considered. Among them was an alternative aimed at energy conservation and load management, which would encourage power and energy customers to consider cost-effective demand-side and supply-side options, renewable energy alternatives, and efficiency. Upon further investigation, however, this alternative action was eliminated because it failed to meet the purposes and needs for NTP and because the projected benefits are anticipated to be minimal.
	E. The speaker indicated that he has never had electricity and that he doesn't want to have it because of the costs.	E. Comment noted
	F. Finally, Mr. Benally stated that those benefitting from the project would be those owning "shares."	F. See response to Issue 1 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
Issue 3 - Health and Safety	Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Timothy Tso	A. The speaker expressed opposition to the project stating that monetary benefits will not reach the community or the Navajo Nation but only Anglos and the United States government. B. The speaker stated that water resources needed to be conserved for livestock and that if they had not given away their resources (e.g., water) and knew how to generate electricity, the community might be able to directly benefit from such a project. C. Mr. Tso concluded by stating that transmission lines cause radiation.	A. See response to Issue 1 in FEIS Chapter 1 B. Comment noted C. See response to Issue 3 in FEIS Chapter 1
Thelma White	A. The speaker inquired as to whether the financial benefits would "be tangled up" with the Hopi Tribe since Hard Rock is close to the Hopi Reservation. Ms. White stated that there is little land left in the Hard Rock Chapter because most of it has been given to the Hopi Tribe. B. She explained that there are lines going through the area but do not directly benefit the community. C. She inquired how much radiation is emitted from the lines and suggested that a long-range study be done to assess associated health effects for those living near the lines.	A. The Hopi have no financial interest in the project if the line does not cross the Hopi Reservation. B. Comment noted C. See response to Issue 3 in FEIS Chapter 1
Shiprock Chapter - October 16, 1996		
Willson Phillips	A. Mr. Phillips stated that he and the others were opposed to the project explaining that the revenues would not reach them. However, the speaker stated that "if we were to get some monies, then we would maybe support this project." He inquired to whom the revenue would be going and if the monies would be put into the Navajo Nation general fund.	A. See response to Issue 1 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Willson Phillips (continued)	B. Mr. Phillips expressed concern that the proposed line would cross lands that many people use for grazing. C. The speaker also indicated that there are unauthorized activities (e.g., parties and drinking) along existing access roads and encouraged better monitoring. Finally, Mr. Phillips stated that stock/watering ponds have been damaged and "sacred sands" have been taken from sacred sites.	B. As stated in the DEIS, page 4-22, the presence of the transmission line would not interfere with grazing. Grazing is a use of the right-of-way that is allowed. C. Comment noted
Vern Lee	A. Mr. Lee stated that he recalls this proposal being one of several different projects negotiated under the McDonald administration in conjunction with NAPI and perhaps DPA. The speaker continued, stating that it was his understanding that the existing 200kV line, along with $600 million up front, was to be turned over to the Navajo Nation as well as partial ownership of the existing 500kV line. B. Mr. Lee indicated that although there is no plan in place to address compensation, land users will want some type of compensation because it has become customary (e.g., past experiences with oil companies). Also, the speaker believed that because the line would parallel an existing corridor land users would not receive right-of-way compensation; Mr. Lee made the analogy to an existing water line that parallels a utility corridor in the area. C. The speaker expressed concern that although the line will cross Navajo lands the project will be controlled by people other than the Navajo. D. The speaker stated that the Navajos have a poor communication system and inquired as to how Navajo involvement in deregulation might affect the quality of these systems on the reservation.	A. There are no plans to turn over the 230kV line to the Navajo Nation. The 230kV line is owned by Western. NTUA has received 22 MW of power from the line annually for distribution from the Kayenta and Long House Valley substations. The 22 MW at a current rate of $21.72 per kilowatt year is equivalent to approximately $477,840. We have no knowledge about the future ownership of the 500kV line. B. See response to Issue 5 in FEIS Chapter 1 C. See response to Issue 1 in FEIS Chapter 1 D. Deregulation in the electrical utility industry would not directly affect communications on the Navajo Reservation.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Perry Garnenez (Farm Board Member)	A. Mr. Garnenez expressed concern that when projects of this size are proposed "there is always some manipulation between here and Washington" and that "Navajo power is just being used as a token, being used to get people behind it." As an analogy, the speaker cited the Navajo Dam project as not providing water as originally agreed upon as well as the existing APS line not providing low cost electricity as stated in preliminary negotiations. Mr. Garnenez was "suspicious" that the line would be completely controlled by the Navajo. B. Additionally, the speaker explained that even though people are not supporting the line the Tribe could use eminent domain to remove those living in the right-of-way.	A. This project is proposed and managed by DPA, a Navajo Nation enterprise. DPA obtained Federal funding for preconstruction activities and asked Western, an agency of the Department of Energy, to prepare the EIS. The Federal government has not participated in any other way. The intent is for DPA to be the majority owner of the project. Participation by others will depend on negotiated agreements. B. DPA's objective is to negotiate with each affected land user. Only if a right-of-way agreement cannot be negotiated successfully would DPA request that the Navajo Nation exercise its right of eminent domain.
Round Rock Chapter - October 16, 1996		
No speakers		
Cudeii Chapter - October 16, 1996		
Harry Lee (Grazing Official)	A. The speaker was in favor of the project stating that it would benefit the Navajo people in terms of employment and revenues. Mr. Lee noted "that at one point we even supported it with a resolution." He also indicated that people were once afraid of electricity but that now it seems as though it is a part of their life.	A. Comment noted

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Daniel Yazzie (Chapter President)	A. Mr. Yazzie indicated that in the past there was a feasibility study conducted and taken to Washington to assess the potential of using electricity across Navajo lands as "people ("children from the descendant of Sam Kia") were suffering from the western effects of life...." The speaker stated that the Navajo people didn't want to lose out again, explaining that in the past (e.g., Navajo Dam) the Navajo have been manipulated and mistreated.	A. Comments noted
	B. He expressed the need to provide the people with information so that they can make a proper decision.	B. See response to Issue 4 in FEIS Chapter 1
	C. He inquired as to how "this relates to our cultural resources."	C. As explained in the DEIS, cultural resources have been and will continue to be an important consideration. See DEIS Chapter 2, pages 2-35 to 2-42; Chapter 3, pages 3-76 to 3-92; Chapter 4, pages 4-48 to 4-74; Chapter 5; and Appendix A.
	D. Finally, he urged that the project be looked over closely for the benefit of future generations.	D. See response to Issue 1 in FEIS Chapter 1
	Rock Point Chapter - October 16, 1996	
Frank W. Begay	A. Mr. Begay's comments favored the northern route explaining that he was informed that if the line were to go through the Lukachukai area the Hopi might "cause a hindrance."	A. Comments noted
	B. He also believed that the money received from the project would benefit their resources (e.g., coal and gas).	B. See response to Issue 1 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
Issue 3 - Health and Safety	Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Red Valley Chapter - October 17, 1996		
Albert Emerson	A. The speaker explained that hearings for the development of the existing line were not held properly stating that "they just happened" and that no right-of-way compensation was given. He indicated that they would be compensated for this project and that it should be provided in lump sum. B. Mr. Emerson stated that any lands disturbed within the right-of-way should be reclaimed claiming that no such efforts were undertaken for the existing line. C. He believed that people should have a say in how revenues are used. D. Mr. Emerson explained that although the electricity is not theirs, oversight of the line will be provided by the Navajo Tribe. E. Finally, the speaker explained that employment will be short term and that only some opportunities to work at the substation would exist because it's computer operated.	A. See response to Issues 4 and 5 in FEIS Chapter 1 B. As described in the DEIS, pages 2-19 to 2-35, the lands disturbed would be rehabilitated. C. See response to Issue 1 in FEIS Chapter 1 D. Comment is correct E. See response to Issue 6 in FEIS Chapter 1
Ruth Peshligai	A. Ms. Peshligai explained she wasn't in favor of the project because when the existing line was built her house was removed without compensation or assistance to rebuild it. B. The speaker also stated that the dangers of the line worry her. C. Ms. Peshligai indicated that people would like the lands to be reclaimed. D. She also stressed the importance to keep the people informed about the project.	A. Comment noted B. See response to Issue 3 in FEIS Chapter 1 C. As described in the DEIS, pages 2-19 to 2-35, the lands disturbed would be rehabilitated. D. See response to Issue 4 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Manson Harvey	A. Mr. Harvey expressed concern that reservation lands are being used for the benefit of others living off the reservation and that royalties were not received for existing utilities (e.g., existing power lines and oil wells). B. The speaker explained that they were never informed about the development of the existing line in the area and that it was his belief that they would receive electricity from it. C. Mr. Harvey stressed the importance of involving the land users and soliciting their input for this project as it concerns their safety and well-being. Mr. Harvey stated that his mother lives really close to the line and believed that "there is probably more emission that we don't know about."	A. Comment noted B. Western and DPA have no knowledge regarding the negotiations associated with the 500kV line that crosses the southern portion of the Red Valley Chapter. C. See response to Issues 3 and 4 in FEIS Chapter 1
John Benally	A. Mr. Benally lives somewhere near an existing transmission line and is bothered by the noise from the line. The speaker does not want a new line crossing his land or too close to his home. B. Mr. Benally feels that the chapter should receive monetary compensation. "If we don't get enough monies, I'm opposed to it because of this noise that's producing during rainstorms."	A. As explained in the DEIS, pages 4-47 to 4-49 and 4-78 to 4-79, the sounds to which Mr. Benally is referring are an electrical byproduct of transmission lines known as "corona effects." Although corona-generated noise associated with NTP may be audible especially during wet-weather conditions (e.g., rain, snow, or fog), line noise generated by the project would be masked by naturally occurring sounds beyond the right-of-way. B. See response to Issue 1 in FEIS Chapter 1
Phillip Harrison	A. The speaker stated that the purpose of this hearing was to help people understand the environmental process and solicit formal comments for the record. B. He stated that his grandfather can't tolerate the noise from the existing line, especially during rainstorms.	A. Yes, the purpose of the public hearing was to solicit formal comments. B. Comment noted

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Willie Johnson (Chapter President)	A. Mr. Johnson indicated that there are a lot of concerns regarding health and safety related to transmission lines.	A. See response to Issue 3 in FEIS Chapter 1
	B. The speaker inquired what the routes are, whose residence it will cross, whose land will be used for the right-of-way, how many miles it will be, and what the environmental processes are on the lands that it will cross.	B. As explained in the DEIS on pages S-7 and S-8, there were a total of four alternative routes between the Shiprock and Moenkopi substations; and a total of six alternative routes between the Moenkopi and Marketplace or Mead substations. The environmentally preferred route from Shiprock to Marketplace is approximately 467.1 miles in length. Refined land use studies are currently being conducted to determine whose residences may be affected and whose land will be crossed. As explained on pages 2-35 to 2-36 and in Appendix A, the environmental planning process for the NTP involved a regional feasibility study, scoping, resource inventory, impact assessment, screening and comparison, and selection of an environmentally preferred route.
	C. Additionally, Mr. Johnson wanted to know what costs and revenues are involved with the project. He explained that existing lines and generation plants on the reservation are benefitting those living off the reservation. The speaker stated that the Navajo would like see the same benefits.	C. Refer to the DEIS on page 2-34 and Table 4-3 on page 4-29 for an estimate of costs. The amount of revenue would depend on final percent of ownership, right-of-way costs, lease agreements, operation and maintenance costs, and availability of capacity (DEIS, page 1-6). Also, see response to Issue 1 in FEIS Chapter 1.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
	Chilchinbeto Chapter - October 17, 1996	
Lee Gambler (Chapter President)	A. Mr. Gambler explained that the Navajo people want to see this project through to its completion. B. He encouraged the cooperation of the Navajo people and NTUA so that the northern route can be established, explaining that perhaps the line could feed into the Kayenta switching station for local distribution. C. Mr. Gambler also expressed the need to conserve sacred ceremonial sites and plant and animal resources.	A. Comment noted B. See response to Issue 2 in FEIS Chapter 1 C. Western and DPA agree. As explained in the DEIS, cultural resources have been and will continue to be an important consideration. See DEIS Chapter 2, pages 2-35 to 2-42; Chapter 3, pages 3-76 to 3-92; Chapter 4, pages 4-57 to 4-74; Chapter 5; and Appendix A.
James Laughter (Chapter Official)	A. The speaker questioned if they receive money from existing lines and if revenue would be provided from the proposed line. He explained that people were paid only a lump some for existing rights-of-way and that it did not benefit the Navajo people too much. B. He was in favor of the northern route stating that he didn't want a line going through the Hopi Reservation because the Navajo people don't want to lose anymore money or land to them.	A. See response to Issues 1 and 5 in FEIS Chapter 1 B. Comment noted
Suzie Yellowman	A. Ms. Yellowman expressed her appreciation for being properly informed of this project explaining that such notice was not given for existing lines. She was in favor of the project stating that cooperation from DPA and Western would greatly improve the reservation (e.g., generation of income for investment in education and welfare of kids).	A. Comments noted

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Leroy Yazzie	A. The speaker stated that "this chapter, myself, does support the efforts of the proposed line that would run the northerly direction from Four Corners through Kayenta on to Kaibito and Cameron, because this line will be owned by the Navajo." Mr. Yazzie explained that they were thankful for the opportunity to provide input as there was no such opportunity for existing lines. Finally, the speaker stated that the line would provide income benefits to the chapter.	A. Comment noted
	Cove Chapter - October 17, 1996	
Frank Yazzie	A. Mr. Yazzie wanted to know where the route was planned, specifically wanting to know from which substation the line would begin and end.	A. At the time of the public hearings a final route had not been selected. Rather, the DEIS addresses the alternative routes and the environmentally preferred route (see DEIS Figure 2-10). As currently planned, the line would begin at the Shiprock Substation and end at Marketplace Substation.
	B. The speaker expressed appreciation for being informed and the opportunity to speak at the hearing, particularly those who will be in the path of the line.	B. Comment noted
	C. Mr. Yazzie inquired as to the amount of revenues that would be generated and stated that he wasn't aware that they weren't making money from the existing lines.	C. The amount of revenue is not known exactly at this time. As stated in the DEIS on page 1-6, the amount of revenue would depend on final percent of ownership, right-of-way costs, lease agreements, operation and maintenance costs, and availability of capacity.
	D. Mr. Yazzie thought it was a good plan and believed that "most people are in favor of it. If the chapter officials are to move this project along, we would support it because they are our leaders."	D. Comment noted

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Mary T. Manygoats	A. Ms. Manygoats stated that she was in favor of the project despite that it was bypassing the chapter. B. She inquired whether or not the line would be expanded. C. The speaker explained that they have been told how to use the land near power lines and that she believed that "most people are aware of the uses and the do's and don'ts about these transmission lines." She was thankful for the opportunity to provide input and also that hearings were being conducted at other chapters.	A. Comment noted B. No plans for expansion are being considered at present. C. Comments noted
James Sorrel Horse (Co-Chapter Secretary-Treasurer)	A. The speaker explained that many of the elderly Navajo people have suffered afflictions and persecutions (e.g., "long walk" and uranium mining) and that they are thinking that this project, being a new technology, is just another "experimentation" or "surveillance" being put among them. B. He further indicated that the elderly are wondering why all the studies are being done. C. Mr. Horse believed that in looking back it seems that the project and its benefits are too good to be true. He inquired whether or not revenues from the project will be put in the general fund on an annual basis.	A. Comment noted B. The studies have been conducted to understand the environment that may be crossed by the line so we can plan ways to avoid or reduce the amount of potential impact on the natural, human, and cultural environment. As stated in the DEIS, page 1-7, these studies were conducted in compliance with NEPA, CEQ regulations (40 CFR 1500-1508), and other applicable regulations. C. See response to Issue 1 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
James Sorrel Horse (Co-Chapter Secretary-Treasurer) (continued)	D. The speaker stated that if the line were to run through a single right-of-way that it will affect people living in its path, stating that those people living far away from it may not be concerned. E. In general, the speaker favored the project stating that all the studies have been carried out.	D. Individuals living near the right-of-way or using lands crossed by the right-of-way would be contacted and informed about the project. E. Comment noted
Shonto Chapter - October 17, 1996		
Jimmy Bryant	A. Mr. Bryant inquired whether or not the existing line could be renegotiated. B. The speaker also questioned whether the proposed line would be leased or if it would be a "one-time deal." He stated that contracts and negotiations should be based on short-term leases so that they could be renegotiated to be kept even with living costs. C. He stated that the Navajo people sell their resources cheap (e.g., coal) and that coal mining operations should be slowed in order to reduce surplus supplies so that it is kept in demand. D. Finally, Mr. Bryant inquired whether or not the line would benefit local residents by tapping into substations.	A. The right-of-way is held in perpetuity by the Federal government. B. As proposed and explained in the DEIS, pages 1-4 to 1-6, revenue would be generated by leasing the capacity of the transmission line to regional utilities over the life of the project. The duration of each contract has not been determined yet. C. Comment noted D. See response to Issue 2 in FEIS Chapter 1
Lieley M. Endischee	A. Ms. Endischee stated that her mother resides in the Inscription House area and that the line should be put on the west side of the roadway because a line exists near her house and she does not want another one near her residence.	A. Comment noted

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Tom Laughter	A. Mr. Laughter stated that he resides about one thousand feet south of the existing line.	A. Comment noted
	B. He expressed concern that there was not enough public notice given because not very many people were at the hearing, particularly those that reside near the existing line.	B. See response to Issue 4 in FEIS Chapter 1
	C. He stated that there is a distrust for the U.S. Government and California because of past experiences (e.g., one-time payment for existing line). In reference to the question posed by the previous speaker, he stated that leases for existing lines would not be renegotiated because they got a good deal.	C. Comment noted
	D. The speaker believed that although the line was "proposed" it would go where the existing line is regardless of what they say.	D. Paralleling an existing transmission line is preferred because less impact results. However, during the environmental studies for the EIS, the alignment of the alternative routes were realigned away from the existing route in some areas to avoid the potential for increasing impacts (e.g., on residences or other land uses). As the project progresses and land use information is refined, additional modifications to the alignment may be needed.
	E. Mr. Laughter did not believe that monies would be put in Navajo college funds as stated.	E. See response to Issue 1 in FEIS Chapter 1
	F. The speaker stated that the drawings were not accurate, stating that they have not answered questions regarding the safety of the line.	F. Much information regarding safety has been made available at meetings, in the DEIS, and through telephone requests. See response to Issue 3 in FEIS Chapter 1
	G. Finally, he expressed concern that the line's impact on views be taken into consideration.	G. As described in the DEIS, impacts on views have been considered as a part of the environmental studies (see DEIS Chapter 2, pages 2-35 to 2-42; Chapter 3, pages 3-61 to 3-76; Chapter 4, pages 4-35 to 4-47; and Appendix A).

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
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Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Billy Black	A. The speaker stated that he resides under the existing line and that he has three roads going through his land. Mr. Black indicated that the existing line has done a lot of damage to the environment in the Shonto area and that he would not like another line going through the area. B. He also expressed concern that clearing for the right-of-way would "take most of the lands that we use for our grazing...."	A. Comment noted B. Minimal impacts on grazing is anticipated. Vegetation would be cleared at each tower site only. The right-of-way would not be cleared; only mature plants (e.g., trees) that would interfere with the line would be removed. Existing access roads in the Shonto area would be used; no new roads would be cleared. When construction is completed, the disturbed area would be revegetated and the right-of-way (even around the towers) may be used for grazing. Refer to page 4-22 in the DEIS.
St. Michael's Chapter - October 21, 1996		
Jimmy Bitsuie	A. Mr. Bitsuie explained that Navajo people have difficulty in understanding the expert's language. The speaker explained that it should be made more clear as to what it takes to deliver electricity to residences (e.g., switch stations). He stated that many people have moved and built homes near the existing power line expecting that they will receive electricity. B. Mr. Bitsuie stated that a provision be included allowing the development of a substation in the central part of the reservation.	A. See response to Issue 2 in FEIS Chapter 1 B. See response to Issue 2 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Jimmy Bitsuie (continued)	C. The speaker questioned why a comment stating that "this transmission bottleneck essentially precludes economic sales of electricity to marketplace in south-central Arizona, Nevada, and southern California" did not include consideration of the Navajo Tribe. He stated that the Navajo Nation should be just as entitled to the electricity as residents outside the reservation. D. Finally, the speaker inquired if employment opportunities would be long- or short-term.	C. See response to Issue 2 in FEIS Chapter 1 D. See response to Issue 6 in FEIS Chapter 1
Cameron Chapter - October 21, 1996		
David Peshlakai	A. Mr. Peshlakai explained that they are impacted by several utilities (e.g., Peabody Coal slurry line, SRP transmission line, ARCO gas line, and telephone lines), which create a disgraceful impact on views in all areas. B. The speaker expressed concern that lands would be lost for future homesite leases, agricultural activities, and tourism economic development. He explained that as more people come back from various cities they are being forced to move away from the lines.	A. Comment noted B. As explained in Chapter 4 of the DEIS, loss of lands for future homesite leases would be minimized by paralleling existing corridors and the use of several mitigation measures. Also, as explained in Chapter 4 of the DEIS, impacts on agriculture would be very localized (i.e., Link 240 near the San Juan River in New Mexico) and would be minimized through careful tower placement or spanning cultivated fields. Finally, the addition of NTP in the Cameron area is deemed to have inconsequential impacts on tourism activities given that electricity from NTP would be "wheeled" over the existing 345kV and 500kV lines from an intermediate substation located north of the Bennett Freeze area (a site in the Red Mesa area is preferred) to the Moenkopi Substation area, thereby avoiding immediate construction within the area.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
Issue 3 - Health and Safety	Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
David Peshlakai (continued)	C. He explained that in addition to the community being in opposition to the line, the chapter passed a resolution to not allow the passage of the line through Cameron. D. Mr. Peshlakai believes "that the Navajo people does not have any power over the council to have them change their minds to desecrate the Native American trust land...seeing this line as revenue...not alone seeing desecration for lands." The speaker stated that the people have no choice in determining whether or not future lines are developed in the area.	C. Comment noted D. See response to Issues 1 and 4 in FEIS Chapter 1
"Charles"	A. The speaker indicated that past promises had been broken regarding the distribution of electricity to homesteads and that this would once again be the case.	A. The DEIS, on page 1-6, states that "NTP would allow Western an alternate path for firm-power deliveries of electricity to the Kayenta and Long House Valley substations. That would provide NTUA with more flexibility to plan additional distribution [of electricity]." No promise is made assuring distribution of electricity to homesteads. See response to Issue 2 in FEIS Chapter 1.
Grace Yellowmexican	A. Ms. Yellowmexican expressed concern for the amount of lines converging on the Cameron community. B. She stated that power lines pose safety problems to both humans and livestock, particularly when it rains, and that illnesses (e.g., cancer) could be caused by the line. C. She also explained that they were trying to build a school in the community but that was debated. D. Additionally, Ms. Yellowmexican believes that the lines interfere with the weather (e.g., rain). E. The speaker concluded stating that she was opposed to the line going through the community.	A. Comment noted B. See response to Issue 3 in FEIS Chapter 1 C. Comment noted D. Comment noted E. Comment noted

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Ramona Charles	A. Ms. Charles commented on the previous speaker's comments stating that the lack of rain in the area is not due to the power lines.	A. Comment noted
Chinle Chapter - October 21, 1996		
Dwayne Billsie	A. Mr. Billsie mentioned that at a previous meeting with Jerry Elwood, DPA, the chapter opposed the project. He inquired why another alternative route was not considered "along the green line on the south side all the way down through Chinle, down south along the Hopi Reservation by way of Steamboat to Teas Toh to Tolani Lake and back up to Four Corners." Mr. Billsie understood "that all the EPA and everything has to be done" for projects like this. B. The speaker stated that power is needed in the Chinle Valley because no businesses will move into the area due to a shortage in electrical power.	A. As described on pages B-6 to B-13, and shown in Figure B-3 of the DEIS, there were several alternatives south and east of the Hopi Reservation that were studied and eliminated based on environmental factors. B. Comment noted
Theodore Evans	A. The speaker expressed concern that the people in the Chinle area don't seem to take interest in projects such as this one. B. Mr. Evans stated that the project appears to be preapproved judging from the graphs presented at the hearing. C. However, he favored the project stating that the Navajo Nation would receive revenues.	A. Comment noted B. At the time of the public hearings, no decision about the final route had been made. The decision will be documented in the Record of Decision following issuance of this FEIS. The maps illustrate the alternative routes including the environmentally preferred route addressed in the DEIS. C. Comment noted

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Theodore Evans (continued)	D. He inquired as to how much money the chapter would receive from the line, stating that they never receive enough money for services in the community. The speaker suggested that "they take the lines per chapter boundaries to generate funds for the chapter," explaining that other people benefit from projects that come onto their land but not vice versa. E. Mr. Evans expressed concern that people need to be informed about the dangers associated with the line to both humans and livestock.	D. See response to Issue 1 in FEIS Chapter 1 E. See response to Issues 3 and 4 in FEIS Chapter 1
	Bodaway Chapter - October 21, 1996	
Riley Hoskey	A. The speaker inquired whether or not there was an environmental impact assessment conducted for the existing lines going from Page to Cameron.	A. The transmission lines from the Page area to the south through Cameron were constructed prior to the implementation of NEPA; no environmental impact statements were required.
Lisa Haskey (Navajo Nation Official for Local Empowerment).	A. Ms. Haskey questioned if the money from the project would be disseminated to the general fund. The speaker indicated that she would like to "see some of the dollars out there."	A. See response to Issue 1 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Evelyn Akathy	A. Ms. Akathy wanted to know that if "the chapter already opposed to this plan going through the chapter boundaries...regardless of the opposition, does the project still go through." B. The speaker also inquired if just owning the line would be the only benefit to the Navajo Nation and the Bodaway/Gap Chapter. C. She stated that people need to receive more information about the safety of the line because people have voiced their concern about the noise when its cloudy and raining.	A. DPA's objective is to negotiate with each affected land user. Only if a right-of-way agreement cannot be negotiated successfully would DPA request that the Navajo Nation exercise its right of eminent domain. B. See response to Issues 1 and 2 in FEIS Chapter 1 C. Aside from the information provided in the DEIS (pages 2-32 to 2-33 and 4-48 to 4-56) and public meetings, DPA is committed to inform the public during future Chapter meetings and discussions regarding potential safety concerns.
Leonard Sloan	A. Mr. Sloan expressed concern that only a few people with grazing rights were at the hearing and that "they're the people that you have to go through." He suggested attending a Grazing Committee meeting in order to get an answer with regards to the project. B. Mr. Sloan also inquired as to which substations would be built, if they would service residences and, if so, how many homes does each substation service. Finally, the speaker inquired as to who would own the line.	A. Once a final route is selected, DPA would contact Grazing Committee Officials and individuals with grazing rights. B. At present, the plan is to install new substation equipment at the existing Shiprock Substation and at the Marketplace Substation. A decision regarding which of the alternative intermediate substations (Honey Draw, Coppermine, Red Mesa, Moenkopi, or Red Lake) has not been made (a site in the Red Mesa area is preferred). As explained on pages 1-1 to 1-2 of the DEIS, DPA would be the majority owner of NTP with other utility interests participating.
	Tselani/Cottonwood Springs Chapter - October 22, 1996	
No speakers		

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Tuba City Chapter - October 22, 1996		
Clyde Goodman (ACC and IGC Committee Member with the Inscription House Chapter)	A. Mr. Goodman indicated that he would like to see a substation built near Inscription House and that local electrical distribution be provided to the community and the Navajo Mountain communities.	A. As explained in the DEIS, pages 2-10 to 2-11, three alternative intermediate substation sites are being considered for NTP. However, none of these sites are located in the Inscription House area. See response to Issue 2 in FEIS Chapter 1
Harry Goldtooth (Grazing Committee Chairperson)	A. Mr. Goldtooth stated that he favored the northerly route—it would be Navajo-owned and provide money and jobs, securing the Navajo Nation. B. Additionally, the speaker stated the need for revenues to reach the chapters. C. Mr. Goldtooth expressed concern that some of the livestock owners support the project while others oppose it. D. He inquired how much right-of-way is being requested for the line and what uses will be permitted within the right-of-way.	A. Comment noted B. See response to Issue 1 in FEIS Chapter 1 C. Comment noted D. As explained in the DEIS, pages 2-15 to 2-19 and 2-33, new or additional land rights would be needed to accommodate NTP, including transmission lines, access roads, and substations. New right-of-way would require a total width of 250 feet (see Figure 2-5). However, the majority of the alternative routes parallel existing transmission lines, which would limit the amount of new right-of-way needed. Examples of uses generally permitted within the right-of-way include grazing, most crop production, vehicle access, low-growing trees, open storage areas, corrals, and stock tanks.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Harry Goldtooth (Grazing Committee Chairperson) (continued)	E. The speaker explained that people need to be informed of what hazards are posed to livestock and humans when lines are struck by lightning and make noise. He explained that a barbed wire fence near the Coalmine Mesa Chapter picks up electricity during storms and could cause harm to livestock. F. Finally, he wanted to know if access roads constructed for the line would be reseeded at a future date.	E. See response to Issue 3 in FEIS Chapter 1 F. As explained in the DEIS, page 2-22, access roads that are not required for maintenance of the transmission line would be restored as described on page 2-23.
Kee Walsh	A. The speaker inquired what direct benefits would be associated with the proposed line. He stated that people need local electrical distribution. Mr. Walsh also explained that in Window Rock many people have lights in their residence, even in the mountainous areas. The speaker noted that prior promises to receive local electrical distribution and water as a result of the Navajo Generating Station were not kept; he believed that benefits will be denied once again.	A. See response to Issue 2 in FEIS Chapter 1
Leonard Viciente (Realty Specialty Supervisor for Real Estate Service House, Navajo Agency)	A. Mr. Viciente inquired how much the line was going to cost. B. He wanted to know if chapters would be assisted if they wanted to extend a line to a residence. More specifically, he questioned if chapters could request BIA money generated from the proposed line in order to establish right-of-ways for distribution of electricity to residences.	A. The estimated cost of the proposed project is addressed in the DEIS on page 2-34. B. See response to Issue 2 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
	Rough Rock Chapter - October 22, 1996	
Pauline Bahe (Chapter Secretary)	A. Ms. Bahe expressed concern that local electrical distribution would not be provided because the line had been moved to the north. She inquired whether or not electricity could be taken from Kayenta to Chinle. Ms. Bahe stated that many people in the area do not have electricity.	A. See response to Issue 2 in FEIS Chapter 1
	Tonalea Chapter - October 22, 1996	
Ira Phillip	A. Mr. Phillip stated that the line should not be put through the White Mesa area explaining that the area is sacred and is used for trading and grazing.	A. The alternative route southeast of White Mesa is part of the Preston Mesa subroute. Page B-16 of the DEIS documents that this subroute (composed of Links 582, 584, 585, 589, 590, and 591) was eliminated from further consideration after comparison with the Kaibito Plateau alternatives. The Preston Mesa subroute was found to have higher potential impacts on Navajo and Hopi traditional cultural places, as well as on views from residences and the Great Western Trail.
	B. The speaker wanted to know about the potential hazards of power lines on humans and livestock. Mr. Phillip expressed the need to inform people at the public hearing regarding such effects.	B. See response to Issues 3 and 4 in FEIS Chapter 1
Frank Betony	A. The speaker stated that he would support the "yellow line" and not the central route through the Hopi Reservation because it would create more conflict and also that the line should benefit the Navajo, not the Hopi Tribe.	A. Comments noted

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Billy Reese Kee	A. Mr. Kee stated that he was pleased to see that the route crossing the White Mesa area was eliminated because it could pose dangers to humans, livestock, and sacred sites. The speaker indicated that there are advantages associated with the power but that he would like to be provided with more information regarding the effects of power lines on peoples' health. The speaker inquired as to what effect the line would have on pacemakers or metallic joints.	A. Mr. Kee's comments are noted. As explained in the DEIS, pages 4-53 to 4-55, the likelihood that persons with pacemakers would be susceptible to interference from the project is judged to be small given that (1) the alternative routes are generally located away from highly populated areas; (2) people with pacemakers living in Arizona, New Mexico, and Utah are at least 20-fold smaller than the national average; and (3) recent design improvements of pacemakers enable them to detect and filter out electrical interference. Also see response to Issue 1 in FEIS Chapter 1
	B. He indicated support for the northerly route stating that it would avoid the Bennett Freeze area, concentrations of people, and livestock.	B. Comment noted.
	C. Mr. Kee explained that due to past experiences (e.g., the railroad and the promise of water for their livestock) people have doubts every time there is a proposal put forth with regards to associated benefits. The speaker believed that the project would supplement the Navajo Nation's general budget and that revenues could be used for the benefit of the people in various ways (e.g., chapter house renovation, employment, pre-school or college scholarships, etc.).	C. See response to Issue 1 in FEIS Chapter 1
	D. Finally, Mr. Kee inquired as to what it takes to reduce the line (voltage) such that it is able to serve a small community and what the involved costs would be.	D. See response to Issue 2 in FEIS Chapter 1.

Key:
Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Loretta Luther	A. Ms. Luther urged people to think about the project long term, using the analogy of once getting free coal from Peabody but now having to get a hauling permit for it. The speaker inquired how the electricity would benefit the people once the line was established (e.g., local distribution). She indicated that the people would benefit from the project but that, as she understands it, people will "have to pay for the poles to run the electricity into your homesite."	A. See response to Issue 2 in FEIS Chapter 1
	B. The speaker wanted to know how much disturbance the right-of-way would create explaining that "much of the beauty was taken away" as a result of the existing railroad.	B. As explained in the DEIS, pages 2-15 to 2-19 and 2-33, new or additional land rights would be needed to accommodate NTP, including transmission lines, access roads, and substations. New right-of-way for the transmission line would require a total of 250 feet (see Figure 2-5). However, the majority of the alternative routes parallel existing transmission lines which would limit the amount of new right-of-way needed and, hence, would minimize disturbance.
	C. She stated that she would like to see more chapter officials present at the meeting providing advice.	C. No response needed
	D. Ms. Luther questioned why homesite leases are required on Navajo land that is for Navajo use and why this condition must be met in order to receive electricity to residences.	D. Ms. Luther's question is not directly related to this project.
	E. Finally, the speaker inquired whether or not the project had already been approved by the Navajo Nation in Window Rock.	E. At the time of the public hearings, no decision about the project had been made. The decision will be documented in the Record of Decision following the issuance of this FEIS.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Rose Phillip	A. Ms. Phillip supported the elimination of the alternative route going through the White Mesa area; she favored the environmentally preferred route.	A. Comments noted
	B. The speaker inquired whether or not jobs associated with the project would be available to Navajo people, explaining that some are skilled for employment and that the unemployment rate on the reservation is high.	B. See response to Issue 6 in FEIS Chapter 1
	C. She supported the comments made by the previous speaker regarding the need for electrical service in the Bennett Freeze area.	C. See response to Issue 2 in FEIS Chapter 1
	D. Ms. Phillip also questioned the potential for hazards associated with the line.	D. See response to Issue 3 in FEIS Chapter 1
	E. Finally, the speaker inquired how much disturbance would occur within the right-of-way.	E. As explained in the DEIS, pages 2-15 to 2-19 and 2-33, new or additional land rights would be needed to accommodate NTP, including transmission lines, access roads, and substations. New right-of-way would require a total width of 250 feet (see Figure 2-5). However, the majority of the alternative routes parallel existing transmission lines which would limit the amount of new right-of-way needed and, hence, would minimize disturbance. Short-term disturbance versus long-term use in the right-of-way is explained in the DEIS on pages 4-80 to 4-81. Permitted uses of the right-of-way after construction are describe on page 2-33.

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Felix Isaacs	A. The speaker indicated that he had been to the area where the line was to begin, that it generates electricity like that in Page and Lake Powell, and that it appeared as though there are two sections running into Shiprock and then probably off into an "undesignated area". He believed that "these people" (those conducting the meeting) and people in the area had probably met based on the need for electricity and "expansion of their community."	A. The Shiprock Substation, where the proposed line would begin, is not a power generating station. It is a facility with equipment capable of routing and controlling electrical power, and/or to transform power to a higher or lower voltage. A number of transmission lines enter and exit the substation.
	B. Mr. Isaacs stated that more meetings should be conducted where the line will cross so that certain conditions and issues associated with the project could be discussed.	B. As described in Chapter 5 of the DEIS, a number of meetings have been conducted in various locations to discuss the project. Once a final route is selected and right-of-way begins, DPA will meet with Chapter officials and individuals (e.g, residents and land users in proximity to the line) to discuss specific conditions and issues.
	C. The speaker explained that with the line running through the local area it may provide electricity that could help the elderly in a way that when discharged from hospitals and other locations they could bring home equipment.	C. See response to Issue 2 in FEIS Chapter 1
	D. The speaker expressed that "this is not one moment thing to look over and let it happen," that the younger people "will come forward and ask us questions."	D. No response needed
Many Farms Chapter - October 23, 1996		
No speakers		

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Inscription House Chapter - October 23, 1996		
Mary Thompson	A. Ms. Thompson inquired what hazards are associated with electrical power lines and B. where, within the Inscription House community, is the line proposed to be developed.	A. See response to Issue 3 in FEIS Chapter 1 B. Alternatives in the Inscription House area are located north of State Highway 98 and would parallel Western's existing 230kV transmission line.
Roy Tate	A. Mr. Tate questioned if there are adverse health effects (e.g., cancer) associated with EMFs. B. The speaker also wanted to know if a family could be relocated with assistance (e.g., building materials), as opposed to diverting the line, in the case that the line were to run through a residence. Mr. Tate indicated that there are people living close to the existing line in Kayenta. C. Finally, the speaker indicated his support for the project explaining that people will realize the long-term benefits of the project when revenues are generated and substations are established for local distribution.	A. See response to Issue 3 in FEIS Chapter 1 B. Through careful planning, the intent is to avoid residences and associated facilities to the extent practical. If a residence cannot be avoided by the right-of-way, the residents would be assisted with relocation. C. See response to Issues 1 and 2 in FEIS Chapter 1
Oliver Jordan	A. Mr. Jordan acknowledged the benefits of electricity (e.g., lighting and "warmth") when used safely and stated that the electricity associated with this line would not directly cause harm due to the precautions taken in constructing such a line (e.g., safeguarding against hazards to homes). B. The speaker indicated that the electricity would benefit the people as well as the children in the future.	A. No response needed B. Comment noted

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
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Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Lena Manheimer (Chapter President)	A. Ms. Manheimer inquired whether or not it would be possible to have a substation developed in the area for local distribution.	A. See response to Issue 2 in FEIS Chapter 1
	B. The speaker explained that people in the community were aware of the project stating that they have been given proper notification to express their concerns.	B. Comment noted
	C. Ms. Manheimer noted that the Navajo Nation and their community would benefit from the project (e.g., revenue) but wanted to know if revenues from the line would always be coming in.	C. See response to Issue 1 in FEIS Chapter 1
	D. She indicated that a local distribution line extending north or south and west of the community was scheduled to take place in the next two years as well as the development of a water line in January.	D. The proposed distribution line to which Ms. Manheimer is referring is not associated with NTP.
	E. Finally, the speaker stated that the people have cooperated to support the project but that they expect benefits.	E. See response to Issues 1, 2, and 5 in FEIS Chapter 1
Larry Hurley	A. The speaker inquired why another power line was needed, wanting to know if anything was wrong with the existing line.	A. Nothing is physically wrong with the existing lines; however, they are operating at full capacity. As explained in the DEIS, pages S-2, 1-1, and 1-3, the purpose of NTP is to relieve constraints on the transmission of bulk power west from the Four Corners area to customers in south-central Arizona, Nevada, and southern California.
	B. Mr. Hurley also wanted to know if NTUA would still exist if the line was developed and if there would be a difference in the costs of electricity for those who are now receiving it locally.	B. It is Western's understanding that NTUA, which distributes electricity on the Navajo Reservation, would continue its operation if NTP is developed. NTP would not have a direct effect on lowering existing costs of electricity.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Larry Hurley	C. The speaker wanted to know if the Navajo Nation Council was going to support the project. D. Finally, Mr. Hurley questioned if generation for the proposed line would result from APS or the Navajo Generation Station.	C. At the time of the public hearings, the Council had publicly supported NTP. The council wanted to hear the comments of the public before making a decision. D. The power from several sources of generation in the Rocky Mountains and Four Corners areas would be transmitted using NTP.
Rory Tomasio	A. Mr. Tomasio wanted to know if the preferred route was the only alternative. B. He expressed concern that those in remote areas have not heard about the project or had the opportunity to participate. The speaker expressed the need to not only involve the Navajo Nation but also those outside of the reservation (e.g., Flagstaff).	A. At the time of the public hearings, no decision about a final route had been made. The alternative routes, including an environmentally preferred route shown on the map during the hearing, are addressed in the DEIS (Appendices A and B). The decision will be documented in the Record of Decision following the issuance of this FEIS. B. See response to Issue 4 in FEIS Chapter 1
Tulie Hurley (Chapter President)	A. Ms. Hurley inquired why the proposed line is going to Las Vegas and what the responses from other Chapters have been with regards to the line being extended to Las Vegas.	A. The intent is to deliver a large amount of power through the Marketplace Substation near Las Vegas to areas in the southwest with a high demand and need for electricity.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Mary Grisham	A. Ms. Grisham questioned if the line would be rerouted or if families would be assisted in relocating (e.g., provided building materials) in the event that a residence is within the right-of-way. B. The speaker stated that there are health and hazards posed to both livestock and humans associated with the line and wanted to know if, in the event of illness or death, there would be liability insurance or some other means to cover the loss. C. Ms. Grisham expressed the need to inform people about the risks associated with the line and that the people be protected from such risks. D. Finally, she explained that proper and adequate notice should have been provided to all concerned people.	A. Through careful planning, the intent is to avoid residences and associated facilities to the extent practical. If a residence cannot be avoided by the right-of-way, the residents would be assisted with relocation. B. See response to Issue 3 in FEIS Chapter 1 C. See response to Issues 3 and 4 in FEIS Chapter 1 D. See response to Issue 4 in FEIS Chapter 1
Clyde Goodman (ACC and IGC Committee Member - Tuba City Chapter)	A. Mr. Goodman expressed the need for a substation in the Inscription House area for the distribution of electricity to those in need in this area as well as the Navajo Mountain area; he suggested meeting with tribal leaders and pass a resolution requesting that revenues from the proposed line be allocated for the development of a substation. B. The speaker explained that they were properly informed of the dangers associated with the power line and that people should educate themselves and that measures be developed to safeguard people.	A. See response to Issue 2 in FEIS Chapter 1 B. Mr. Goodman's comments have been noted and standard measures to safeguard people have been developed and would be implemented.
Lukachukai Chapter - October 23, 1996		
Herbert Pioche (Council Delegate)	A. Mr. Pioche explained that public hearings were not held for the existing lines and that the BIA made the agreements valid. The speaker urged participation by the public so that their comments could be incorporated into the project.	A. See response to Issue 4 in FEIS Chapter 1

Key:

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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Willeto Vicente	A. Mr. Vicente wanted to know why they were only given five minutes to speak stating that this was insufficient time to provide comments.	A. For formal Federal hearings, this is a standard and usually adequate amount of time to summarize comments and allow other interested individuals time to comment. Written comments of any length are accepted. Also, see response to Issue 4 in FEIS Chapter 1.
	B. The speaker stated that the Navajo people have been repeatedly "cheated" in the past and that their leaders must take responsibility for informing the people of such projects and looking out for their well-being.	B. See response to Issue 4 in FEIS Chapter 1
	C. He noted the "tremendous growth of the young Navajo people" and expressed concern that they are facing a depleting tribal fund.	C. See response to Issue 1 in FEIS Chapter 1
	D. Mr. Vicente explained that Navajo make inadequate business people regardless of education and attributed this to the loss of the sawmill.	D. Comment noted
Theresa Thompson	A. Ms. Thompson favored the environmentally preferred route stating that the area to the north was "remote" and that not many people use the land in that area.	A. Comment noted
	B. The speaker believed the line would benefit the community in terms of receiving money at both the chapter-level (by issuing a request) and through Window Rock, that it would provide an opportunity for young people to receive an education, and that the project would also provide Navajo people with jobs.	B. See response to Issue 1 in FEIS Chapter 1
	C. Ms. Thompson explained that only Anglos work for APS, stating that people have to be certified and have a degree. She explained that a few Navajo do qualify to work for APS but that they are laid off.	C. Western and DPA do not have knowledge of and, therefore, cannot comment on APS employment practices.
	D. Finally, Ms. Thompson stated that the resources are depleting in the community and believed that they should compete with those that are "happening right now there in the world."	D. No response needed

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
Issue 3 - Health and Safety	Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Mr. Anderson	A. The speaker urged the people to keep on the issue at hand, to comment on the project and not blame other people.	A. No response needed
	B. He expressed the need for the people to unite and support the project, particularly the environmentally preferred route, explaining that while others are benefitting they continue to quarrel.	B. Comments noted
	C. Mr. Anderson expressed the desire to avoid the Hopi Reservation but stated that if the Hopi are "going to be involved, let them be involved..."	C. Comment noted
	D. He also stated that the power lines ("electricities") on the reservation do not benefit them and questioned when they are going to be accounted for.	D. See response to Issues 1 and 2 in FEIS Chapter 1
	E. The speaker explained that when they receive funding the money disappears and there is no accountability.	E. Comment not associated with NTP
Anselm Joe	A. Mr. Joe stated that this project had been in the works for some time and the people were not informed of the project because the people don't participate in the chapter meetings.	A. No response needed
	B. The speaker indicated that the board recommended the environmentally preferred route. He explained that a meeting was held at the chapter house on October 8, 1995 at which time opposition to the central (green) route was expressed based on the need to avoid the Hopi Reservation so that money associated with the project would not have to be given to the Hopi Tribe.	B. Comments noted
	C. Mr. Joe explained that reservation lands are held in trust by the Federal government and that it is the responsibility of the Tribe to learn how to get the money associated with the project.	C. No response needed
	D. He further suggested that they should implement a "service charge" for use of the line in order to increase revenues.	D. Comment noted
	E. Finally, he expressed concern that a one-time payment for the existing line was accepted and urged that they not "make that mistake again.."	E. This comment is not associated with NTP.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Emma Sandoval	A. Ms. Sandoval indicated that she resides somewhere near the existing line. B. The speaker explained that they were presented with information on the alternative routes and that some faced "obstacles" and as a result had to be moved. C. She did not favor the central route but did support the environmentally preferred route. D. Ms. Sandoval explained that the people in the community may not concern themselves with the project because they heard that the Federal government was involved and although they hear their concerns "they're not taking full interest in this whole project with us on the land." E. The speaker inquired whether the lease on the existing line had expired and, if so, if this meant that those receiving electricity would lose their service. If the electricity were in fact to be shut off, Ms. Sandoval indicated that she would like a distribution line extending from the proposed line to her home. F. Finally, the speaker explained that many projects fail on the reservation because people do not understand the processes involved (e.g., applicable laws and regulations).	A. Comment noted B. Yes, the alignment in some areas along the alternative routes, the majority of which parallel existing lines, were realigned to avoid potential impacts. C. Comment noted D. Comment noted E. Local distribution of electricity is not provided directly by high-voltage transmission lines; see response to Issue 2 in FEIS Chapter 1 F. No response needed
Francis Kinsel	A. The speaker stated that he was unaware of how long this project had been in the making. B. Mr. Kinsel indicated that he was in favor of the project but questioned whether or not they were going to be required to pay maintenance and operation fees; he stated that they not "come to us if there is such fee and costs associated with maintenance and operation."	A. Planning for NTP began in the early 1990s. B. As currently planned, DPA would be the majority owner of the line and would be responsible for the operation and maintenance of the line.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Francis Kinsel (continued)	C. The speaker suggested that the Tribe control both the line and one of the existing generating plants to make the project more appropriate and a greater benefit. D. Mr. Kinsel also stated that he would like to receive electricity from the line, explaining that he wanted to be close to wherever the line is constructed.	C. As planned, DPA would control the line, but the Navajo Nation does not own a generating plant to control. D. Local distribution of electricity is not provided directly by high-voltage transmission lines. See response to Issue 2 in FEIS Chapter 1
William Clemin	A. Mr. Clemin stated that although they will receive some money from the project, they will not benefit as much as the people in the western part of the reservation and Window Rock. B. The speaker inquired what type of health effects the line would have on them, explaining that the uranium mine has caused "deformities" and "abnormalities" within their families. He indicated that if the line affects their health it will be their own fault. Mr. Clemin stated that he's "in favor, yet I am not in favor because of the health effects." C. Finally, he wanted to know how they could be sure monies were going to go to Window Rock.	A. See response to Issue 1 in FEIS Chapter 1 B. See response to Issue 3 in FEIS Chapter 1 C. See response to Issue 1 in FEIS Chapter 1
Robert Lee	A. The speaker indicated that he was in favor of the project because it would bring in money for the Navajo Tribe.	A. Comment noted

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Robert Lee (continued)	B. Mr. Lee wanted to know from where the coal needed for the generation of power was going to come.	B. Since there are no new proposed generation plants involved in this project, Western assumes that the coal used to generate power in the Four Corners area will continue to come from the sources used currently. Should other generation plants be added at a later date, it is possible that other sources of coal, as well as other energy resources, could be used to generate the electricity that could be transmitted by this project. None are currently known.
	C. Additionally, the speaker wanted to know if the states through which the line will run can place a tax on it.	C. As stated in the DEIS on page 4-33 "Over the longer term, taxes from operation could be a source of new revenues for some jurisdictions where NTP facilities would be located, depending on ownership and local tax codes. Information for estimating taxable values of project land, facilities, and operations was not available at the time of this investigation."
	D. Mr. Lee inquired whether or not there would be Navajo employment opportunities and if so for how long would they last.	D. See response to Issue 6 in FEIS Chapter 1
	E. Finally, the speaker wanted to know if employment opportunities associated with the line would be overseen by the unions or the Tribe.	E. See response to Issue 6 in FEIS Chapter 1. Whether employment opportunities would be overseen by the unions or the Tribe has not been determined yet.

Key:

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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Unknown Speaker	A. The speaker questioned how the Tribe will own the line, what percent of the project is developed, and what are the other rules and regulations associated with this project.	A. DPA, a Navajo Nation enterprise, would be the majority owner of the project. Only preconstruction activities, primarily the environmental studies in compliance with NEPA, are underway. The Federal, state, and local rules and regulations associated with the entire project are numerous and will be adhered to.
	B. Additionally, the speaker wanted to know that if the generating station was given to them how much interest would outside interests maintain. The speaker indicated that it may be up to the Bureau of Mines to allow them to take part in the ownership of the generating station, the line, and the power.	B. At this time, there is no plan to obtain a generating station as part of this project.
	C. Further, the speaker inquired as to what the market is for this type of project.	C. Refer to Chapter 1 of the DEIS for an explanation.
	D. The speaker indicated that Peabody Western has been selling coal to another company without their knowledge or an agreement to transfer the sale of coal. As a result, the speaker stated that caution be taken in how the line is owned.	D. No response needed
	E. Finally, although the speaker indicated support for the project, he/she believed that the people may be rushing to judgement because there are a lot of unknown implications associated with the project.	E. Comments noted
Edgar Clark	A. Mr. Clark inquired who owns the generating station and if they wanted to could the Navajo take it over.	A. At this time, there is no plan to obtain a generating station as part of this project.
Mr. Kinsel	A. The speaker supported the environmentally preferred route because it would provide revenues to the Navajo people.	A. Comment noted
	B. Mr. Kinsel explained that although there are remaining questions regarding the project, people could obtain the information by discussing it and reading the graphs at the hearing.	B. No response needed
	C. He also stated that the plans for the project are being revised so that it is appropriate for existing resources and human lives.	C. It is true that the project is being modified and refined as it progresses to reduce or minimize impacts on natural, human, and cultural resources.

Key:

Issue 1 - Distribution of Project Revenues
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Alfred Barney (Chapter President)	A. Mr. Barney was in support of the environmentally preferred route stating that it would produce funds and provide for the future of the children. The speaker indicated that the chapter had passed a resolution in support of the project in the past. B. Mr. Barney inquired whether there were two lines proposed in the northern area.	A. Comments noted B. Only one new line is being proposed as a part of NTP.
Theresa Thompson	A. Ms. Thompson stated that she would like to see the Tribe get more than half of the money generated from the line than for scholarships and veteran's programs.	A. Comment noted
Willie Davis	A. Mr. Davis stated that he sometimes herds sheep under the existing line and it seems to affect his health. He inquired as to the health effects that are associated with the line. B. Mr. Davis indicated that he would support the environmentally preferred route because it would generate revenues and also because it is his understanding that there are obstacles to building the line elsewhere (e.g., Hopi Tribe). C. However, he stated that he would not support the project if it would adversely affect the health of humans. He inquired whether or not an option to construct the line in the Lechee area had been considered. D. Finally, the speaker expressed concern that officials in Window Rock may misuse the monies generated from the project and questioned how this might affect the project.	A. See response to Issue 3 in FEIS Chapter 1 B. Comments noted C. Yes, an alternative route in the Lechee area has been studied and addressed in the DEIS, alternative route Glen Canyon 1 (GC1). D. Revenue generated from the project would be used first to pay for costs associated with the project. The remaining revenue that would be deposited in the Tribe's general fund should have no effect on NTP.

Key:

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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Walter Sandoval	A. The speaker stated the Navajo people should have the expertise of the western society explaining that the Navajo "don't really understand the business, the process of enterprising." B. Mr. Sandoval indicated support for the project stating that people do not have jobs and many people need assistance.	A. Comment noted B. See response to Issues 1 and 6 in FEIS Chapter 1
Leonard Robbins (Environmental Services, BIA Navajo Area Office)	A. Mr. Robbins explained that he was attending the hearing to help point people in the right direction and stay focused on the process. The speaker suggested that because many of the people have concerns and questions about money, they should look at the document for information. Mr. Robbins explained that the EIS will include the speakers' comments in the appendix. He indicated that a notice of intent was published several years ago and that the agencies involved include Western, DPA, and several other cooperating agencies including the Navajo Nation, BIA, BLM, as well as the NPS, with each of these agencies having a vote with regards to the final selected route. Mr. Robbins explained that there is a 60-day comment period with responses to comments provided within one year. The speaker went on to explain that the Record of Decision will include the final selected route with the permitting of the right-of-way being decided upon by those in Washington, D.C. and several other agencies after the NEPA process has been approved by the AD and superintendent of the Federal agencies.	A. No responses are needed

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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
	Kaibito Chapter - October 23, 1996	
Phillip Brown (Chapter Official)	A. Mr. Brown stated that he has seen many gatherings where promises were made and that he was wary of promises associated with this project being adhered to.	A. Comment noted
	B. The speaker inquired whether or not the line would provide direct benefits to the community (e.g., electricity and revenue). Mr. Brown stated that revenues should be distributed at the local level since it is his understanding that local empowerment is being advocated for all chapters. He also wanted to know if chapters could contract with the Navajo Nation to receive revenues at a later date.	B. See response to Issues 1 and 2 in FEIS Chapter 1
	C. Finally, the speaker questioned if people could receive electricity in the event that NTUA took control of the line for local distribution.	C. See response to Issue 2 in FEIS Chapter 1; DPA to respond
	D. More specifically, he inquired if proceeds from the line could be used for the development of local electrical distribution.	D. Although DPA and NTUA have been coordinating and discussing NTP and NTUA's plans for local distribution of electricity, there are no plans to use NTP revenue to develop local electrical distribution.
Daniel Gishie	A. The speaker stated that those receiving electricity in Kaibito pay higher rates than those in Page, Arizona.	A. Rates for local electricity are not associated with NTP.
	B. Mr. Gishie explained that he was promised compensation for moving his residence for the existing line but was never given any money or benefits.	B. The existing line is not associated with NTP. However, for NTP, DPA would compensate affected residents and other land users directly affected by the project. See pages 2-15 to 2-19 for a description of the right-of-way process.

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
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Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
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Commentor	Comments	Response
Daniel Gishie (continued)	C. He stated that veterans should receive certain benefits, explaining that there were housing programs (e.g., loans) administered through Window Rock but he was apparently unable to receive such benefits because he did not live within a 50-mile radius of Window Rock or within a 25-mile radius of Tuba City.	C. The benefits Mr. Gishie refers to are not directly associated with NTP.
	D. Mr. Gishie stated that although he is in favor of the project he is "suspicious" and does not believe that any of the money generated from the project would reach Kaibito because it would be controlled in Window Rock. He explained that promises of the Kaibito community receiving 10 percent of proceeds from the existing railroad were not kept.	D. See response to Issue 1 in FEIS Chapter 1
	E. The speaker stated that if NTUA should assume authority for local distribution, money generated from the project should be set aside by the Tribal Council for the development of a substation in the local area.	E. See response to Issue 2 in FEIS Chapter 1
	F. Mr. Gishie also explained that a lot of mineral resources are taken off Reservation lands with the Navajos getting "a meager 4 percent of those resources in return." He explained that he did not want this happening to the Kaibito Chapter.	F. No response needed
	G. The speaker further stated that "although this project is known as Navajo Transmission Project, it seems that the name of the project is an assumed name so that other people will just benefit from us."	G. See response to Issue 1 in FEIS Chapter 1
Oze Begay	A. Mr. Begay stated that this project will derive Navajo employment and that employment of the Navajo people is very important. The speaker explained that the consideration of the needs of the local people is very important.	A. No response needed
	B. He indicated that at the Tuba City Chapter hearing he became aware that there are hazards associated with power lines and that people should stay 200 feet from the power line.	B. See response to Issue 3 in FEIS Chapter 1

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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Oze Begay (continued)	C. Mr. Begay stated that if the line will in fact be owned by the Navajo through DPA then he would like to see communities benefit directly with local electrical distribution and employment for both the elderly and the youth. D. The speaker indicated that when the existing line was proposed they were promised jobs for at least a twenty-five year period but did not receive any jobs or benefits.	C. See response to Issues 2 and 6 in FEIS Chapter 1 D. Comment noted. See response to Issue 6 in FEIS Chapter 1
Jean Gishie	A. Ms. Gishie indicated that she supported the comments provided by the previous speaker (e.g., local distribution and employment) and stated that the Chapter needs money because at one time it was not getting enough money to operate due to mismanagement. B. She believed that Mr. Phillip Brown (previous speaker) wanted to open a local bank because he was advocating the return of revenues to the community. C. Ms. Gishie urged that revenues from the right-of-way negotiations go to the local community. She also indicated the need for local housing; she had to halt construction of her new home due to lack of funds. D. The speaker expressed concern that not very many youths were attending the meeting and explained that they are the ones who the people are asking benefits (e.g., money) for. Ms. Gishie stated that she hoped that the local grazing committee person was in attendance so that he could express concerns related to the safety of livestock. E. The speaker also believed that the line would be safe and that hazards could be avoided. F. Finally, the speaker stated that the project should be constructed so that people might be able to get electrical service to their residence in the future.	A. See response to Issues 1, 2, and 6 in FEIS Chapter 1 B. No response needed, comment is unrelated to NTP. C. No response needed D. Comment noted E. Comment noted F. See response to Issue 2 in FEIS Chapter 1

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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Keith Bennett	A. Mr. Bennett wanted to know if the proposed line was needed for the local community.	A. See response to Issues 1 and 2 in FEIS Chapter 1
	B. He stated that it is a 345kV line and that at that level it cannot service a residence but must be reduced to 69 "megawatt" [should be kV] before it can be brought to homes and the community.	B. The proposed line would be 500kV rather than 345kV. Mr. Bennett is correct that the voltage must be reduced for community and residential uses.
	C. The speaker supported the request made by Inscription House Chapter for the development of a substation to service Navajo Mountain and the residents.	C. See response to Issue 2 in FEIS Chapter 1
	D. Mr. Bennett stated that Kayenta has a substation that is used for local distribution through NTUA. He explained, however, that substations cannot be readily built wherever people want it.	D. Mr. Bennett's comments are correct.
	E. Mr. Bennett stated that a resolution should be adopted requesting that local distribution be part of the project.	E. See response to Issue 2 in FEIS Chapter 1
	F. The speaker supported the environmentally preferred route and the development of a substation at Copper Mine or the other two places and that he did not want to the line to be taken away by the Hopi Tribe.	F. Comments noted
	G. Finally, the speaker stated that concerns regarding right-of-way acquisition would be handled when they met those particular problems and that running the proposed line parallel to the Western line could be safely constructed.	G. Comments noted

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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Elsie T. Begay	A. Ms. Begay stated that when the existing railroad was proposed many livestock owners objected to the right-of-way going through their community but their protests were to no avail and they never received support from the Chapter. She indicated that while some livestock owners were compensated, many were forced to sign right-of-way consents. With regard to the railroad, the speaker also stated that promises of employment for the people were not kept, that they received no monies from the project, and that a public hearing was not conducted.	A. See response to Issues 1, 4, and 5 in FEIS Chapter 1
	B. Ms. Begay stated that people living within the Bennett Freeze area cannot make improvements to their residences (e.g., local distribution) and are limited to the number of livestock that they can graze. As a result, she stated that revenues from the project need to be distributed to the local community so that the needs of the people can be realized.	B. See response to Issue 1 in FEIS Chapter 1
	C. The speaker expressed concern for the lack of youths at the hearing, suggesting that perhaps they do not vote because they receive no benefits from Window Rock. Ms. Begay explained that the Navajo people "have to really force Window Rock to give us some benefits and money," that the people are always given excuses, and that monies in Window Rock "are always being mismanaged."	C. Comments noted
	D. The speaker stated that it seems as though "the outside society" (e.g., Anglos) takes advantage of the Navajo people and makes money off of them whenever the Navajo encounter efforts for their own economic development. Finally, Ms. Begay questioned if the Navajo are being taken advantage of due to their lack of knowledge regarding such projects.	D. See response to Issue 1 in FEIS Chapter 1

Key:
Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Archie M. Haskey	A. Mr. Haskey explained that he was in support of the project, particularly the environmentally preferred route, and that the Navajo Nation is fortunate that control of the project has been given to the Navajo Tribe.	A. Comments noted
	B. He stated that the people should not blame others for not receiving benefits from past projects and that they could realize benefits from NTP through a coordinated effort.	B. Comments noted
	C. The speaker stated that the people should not fear the proposed line as they are being presented with information to examine.	C. Comments noted
	D. Mr. Haskey inquired where the electricity for the proposed line will originate.	D. As stated in the DEIS on page S-2, the transfer of electricity for NTP would occur through the use of existing generation in the Four Corners and Rocky Mountain region. Western's Shiprock Substation west of Farmington in northwestern New Mexico is the eastern terminus for this transfer via NTP.
	E. Finally, he stated that the Kaibito Chapter also should join in the efforts of the Inscription House Chapter for the development of a substation for local distribution.	E. See response to Issue 2 in FEIS Chapter 1
Nina Yazzie	A. Ms. Yazzie inquired whether or not the line was proposed to run into Page or within the Kaibito area.	A. The preferred route crosses the Kaibito Plateau north of the town of Kaibito.

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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
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Commentor	Comments	Response
Benny C. Begay	A. Mr. Begay explained that when living in the Bennett Freeze area any improvements one wants to make to their residence (e.g., local distribution) must be approved by the Hopi Tribe. The speaker inquired how the electricity was going to be brought through the Bennett Freeze area from Kaibito to Cameron given current development constraints. B. Mr. Begay also questioned how the line would be developed around the Bennett Freeze area if the Hopi refuse to grant right-of-way access. C. He stated that he distrusted Window Rock based on past experiences (e.g., their bus used for fire fighting was called back to Window Rock but was never returned to the community) and, as a result, believed that revenues from the project would not reach the local chapter.	A. As explained in the DEIS on pages A-11, the proposed NTP line could connect into an intermediate substation located north of the Bennett Freeze area (Honey Draw, Coppermine, or the preferred Red Mesa substation sites). Electricity then could be "wheeled" over Western's existing 345kV line avoiding immediate construction in the Bennett Freeze area. B. The environmentally preferred alternative does not require new construction on lands owned by the Hopi; hence, no right-of-way access would be required at this time. C. See response to Issue 1 in FEIS Chapter 1
Dennehotso Chapter - October 24, 1996		
Alan Gray	A. Mr. Gray inquired who would own the line along the entire route. The speaker stated that the people are always told that projects will be owned by the Navajo Tribe but that in the end the ownership of projects change or is modified. B. He stated that it seems as though the people do not have the power to stop the project and that it appears as though the project has been preapproved.	A. As currently planned, DPA would be the majority owner of the entire route. B. At the time of the public hearings, no decisions about the project had been made. The decision will be documented in the Record of Decision following the issuance of this FEIS.

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Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Alan Gray (continued)	C. Mr. Gray explained that many elders have been relocated from their lands and that there is concern for the effects that the line might have on vegetation and sacred places where ceremonies are held. D. Finally, the speaker stated that traditional Navajo laws and policies are not accounted for in consideration of such projects.	C. As mentioned in the DEIS, pages 4-55 to 4-56, levels of electricity produced by NTP would be below that at which effects have been observed in crops. Also, as explained in the DEIS, cultural resources have been and will continue to be an important consideration. See DEIS Chapter 2, pages 2-35 to 2-42; Chapter 3, pages 3-76 to 3-92; Chapter 4, pages 4-48 to 4-74; Chapter 5; and Appendix A. Finally, land users would be interviewed regarding important traditional places during the right-of-way acquisition process. D. Construction of the NTP will comply with Navajo laws and policies.
Katherine Tsosie	A. The speaker expressed concern that the line will be developed within an area where her family is going to lease home sites. She inquired why nobody had asked if there were any home-site leases in the area. Ms. Tsosie stated that she did not think that the Western Agency was contacted to see how many home sites were within the right-of-way. B. Additionally, she questioned why the Grazing Committee was not informed of the hearing. The speaker stated that if people involved with the project were concerned they would contact and involve those who have grazing rights.	A. As explained in the DEIS, pages 3-38 to 3-40, impacts on residences were analyzed within a 500-foot-wide study corridor and the proposed NTP right-of-way to determine the potential for both direct and indirect impacts. As the centerline for NTP is refined, additional land use studies will be completed in order to determine impacts on both existing and planned home-site leases. B. See response to Issue 4 in FEIS Chapter 1. The Grazing Committee is on the project mailing list and is sent all project newsletters including the newsletter dated September 1996 announcing the hearings. In addition, the hearings were announced in newspapers, on radio, and on notices posted at locations throughout the area.

Key:

Issue 1 - Distribution of Project Revenues

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Issue 3 - Health and Safety

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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Katherine Tsosie (continued)	C. She expressed concern for the impacts of the line on the health of livestock and humans (e.g., radiation) because she sells mutton to people and was concerned as to how this may affect peoples' health. She wanted to know who would be responsible in the event that someone was to become ill as a result of the power line. D. Ms. Tsosie also inquired whether or not the transmission line would affect the water supply that is to run through a proposed water line in the Black Mesa area. E. She explained that she would like to receive local electrical distribution as she did not receive electricity from the existing line.	C. See response to Issue 3 in FEIS Chapter 1 D. The transmission line would not affect water supply. E. See response to Issue 2 in FEIS Chapter 1
Evvie Tsosie	A. Ms. Tsosie inquired whether or not the votes of those living on the Navajo Reservation counted. She explained that although the Navajo people vote against projects it seems as though their vote is not considered. B. The speaker stated that she believes that NTP has already been agreed and decided upon. C. Ms. Tsosie questioned where the project would take the Navajo children stating that their ancestors told them to live without "all these things" (e.g., television). D. She wanted to know how much of the revenue associated with the line the community would use. The speaker stated that they probably would not receive much of the money because they are "classified."	A. See response to Issue 4 in FEIS Chapter 1 B. At the time of the public hearings, no decisions about the project had been made. The decision will be documented in the Record of Decision following the issuance of this FEIS. C. See response to Issue 1 in FEIS Chapter 1 D. See response to Issue 1 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
Issue 3 - Health and Safety	Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Evvie Tsosie (continued)	E. Ms. Tsosie stated that she worked for Peabody and explained that if they wanted to do something for the Navajo people they should develop a plant on the reservation for the employment of Navajo people.	E. At this time, there is no plan to construct a generating station as part of this project.
	F. She stated that the only reason the line will be called "Navajo transmission" is that there is going to be "a little post" on the Navajo Reservation. Ms. Tsosie stated that the power would not belong to the Navajo, that it would be used by those living off of reservation lands, and that those living off the reservation would get all the money associated with the project with the exception of a small portion for the use of the Navajo name.	F. See response to Issues 1 and 2 in FEIS Chapter 1
Kenny Thompson (Grazing Representative)	A. Mr. Thompson stated that the grazing permittees should be notified of the project. The speaker suggested that home visits be conducted to solicit the concerns of the grazing permittees. Mr. Thompson explained that in looking at the maps it is difficult to pinpoint exactly where the line would run and, therefore, grazing permittees should be notified of the proposed right-of-way.	A. As described in Chapter 5 of the DEIS, a number of meetings have been conducted in various locations to discuss the project. Once a final route is selected and right-of-way acquisition begins, DPA would meet with individuals (e.g., residents and land users in proximity to the line) to discuss specific conditions and issues.
	B. He stated that he would like to know the results of how water, home-site leases, animals, and the land and soil will be affected by the transmission line.	B. The affects of NTP on these resources is described in Chapter 4, Environmental Consequences, in the DEIS.
Beverly Thomas	A. The speaker indicated that her parents live somewhere near the existing transmission line and that she is not only concerned for their health but everyone else's as well. She explained that the proposed line is so powerful that it can cause cancer. Ms. Thomas stated that those living under the existing power line have lost family members because of existing power lines.	A. See response to Issue 3 in FEIS Chapter 1
	B. She explained that it appeared as though the project was already preapproved and that they were waiting for approval of the community despite that there was only a small number of people at the hearing.	B. At the time of the public hearings, no decisions about the project had been made. The decision will be documented in the Record of Decision following the issuance of this FEIS.

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Beverly Thomas	C. The speaker wanted to know who would benefit from the project. She indicated that the power from the line would be owned by someone else off the reservation.	C. See response to Issues 1 and 2 in FEIS Chapter 1
	D. Ms. Thomas stated that the line was proposed to cross the reservation because it was economically feasible and that they wouldn't run the line through the Hopi Reservation because they are better organized and have better lawyers.	D. Comment noted
	E. The speaker also inquired who would be accountable if someone were to become ill as a result of the line.	E. See response to Issue 3 in FEIS Chapter 1.
	F. Finally, Ms. Thomas explained that the central route would affect the spotted owl while the preferred route would affect many people. As a follow-up to the above statement, the speaker questioned who was more important, people or an owl.	F. The evaluation of alternatives as described in Chapter 2 of the DEIS considered many factors, including biological resources (e.g., wildlife) and land use. Those resources with the potential for the highest levels of impact (land use, visual, and cultural resources) were considered to be the most important in the evaluation of alternatives (DEIS, page 2-40).
Tasha Arteen	A. Ms. Arteen stated that although the proposed line will cross reservation lands Anglos will own the power.	A. See response to Issues 1 and 2 in FEIS Chapter 1
	B. She inquired whether or not the community will ever see any of the revenues associated with the project. She explained that the reservation is experiencing a lot of problems (e.g., drugs) and that the younger generation wants to go to school.	B. See response to Issue 1 in FEIS Chapter 1
	C. The speaker stated if projects are proposed to go through the Hopi Reservation the Hopi "just outright says no, and we can't do that, and they're just taking advantage of us."	C. Comment noted

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
Issue 3 - Health and Safety	Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Tasha Arteen (continued)	D. Ms. Arteen explained that the line will produce radiation and that although there are things people can do to protect themselves she did not believe that they would be taught how to do so. Finally, the speaker inquired who would be responsible if someone were to become ill as a result of the proposed power line.	D. See response to Issue 3 in FEIS Chapter 1; DPA to respond
	Kayenta Chapter - October 24, 1996	
Martin L. Begay (Natural Resource Manager, Navajo Parks and Recreation)	A. The speaker stated that his department was responsible for overseeing the Monument Valley Tribal Park and, although it is not directly affected by the project, appreciated that it was identified in the EIS.	A. Comment noted
	B. However, Mr. Begay explained that there are two Tribal Parks that are directly affected by the project but were not mentioned in the EIS, these include the Lake Powell Tribal Park and the Little Colorado River Gorge Tribal Park. He stated that the Resources Committee is responsible for these parks and, as a result, must process any right-of-way resolution.	B. Comment noted
	C. Mr. Begay also explained that there are two natural landmarks in the project area contrary to the EIS stating that there are no natural landmarks in the area. The speaker stated that these include Shiprock and Comb Ridge.	C. Comments noted. However, as depicted in MV-AE (Map Volume-Figure AE), Shiprock and Comb Ridge are not located adjacent to the environmentally preferred route. Therefore, there would be no impacts on these natural landmarks.
	D. The speaker also noted that the EIS makes reference to a 4-18 but there is no such table; he thinks that it should read 4-16.	D. The reference on page S-13 to Table 4-18 should be replaced with Table 4-14. (Significant unavoidable adverse impacts on visual and traditional cultural places.)
	E. Finally, Mr. Begay inquired what the impact of the project on tourism might be given that the line will cross the northern part of the reservation where much of the tourism activities occur.	E. The project would not affect tourism.

Key:
Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Albert Bali (Planning, Kayenta Chapter)	A. The speaker stated that revenues associated with the project should go directly to the chapter for compensation to those people impacted by the transmission line. Mr. Bali explained that compensation should occur on an annual basis as opposed to a one-time payment.	A. See response to Issue 1 in FEIS Chapter 1
Coppermine Chapter - October 24, 1996		
No speakers		
Lechee Chapter - October 25, 1996		
Denny Tsosie	A. Mr. Tsosie inquired how the Hopi Tribe felt about the central alignment crossing their reservation. B. He also wanted to know that if a study had been conducted to determine if it would be cost effective to "beef up the existing frames and to piggyback" the "red line" (GC1).	A. The Hopi response to the central alternatives was mixed; however, alternative C1 was generally preferred because there appeared to be less potential impact on traditional cultural places. B. As explained in the DEIS, page 2-2, several options were considered to maximize the capability of Western's Shiprock-to-Glen Canyon 230kV transmission line while maintaining acceptable voltage levels at the Kayenta and Long House Valley substations. This included uprating the line to a higher voltage level, reconductoring the line (which would take the line out of service for six to nine months), wheeling power through agreements with other utilities, and adding a series of shunt capacitors. Upon further analysis, this alternative was eliminated because it has a very low benefit for the cost and minimal benefits obtained would come at a high cost.

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Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
Issue 3 - Health and Safety	Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Denny Tsosie (continued)	C. The speaker also questioned if the Navajo Tribe or DPA have projected what the profits associated with this project might be. D. Finally, Mr. Tsosie explained that "I'd probably say on behalf of the Lechee Chapter that from the way it looks, it's okay, go ahead with it, but not in my backyard."	C. An estimate of the costs is in the DEIS on pages 2-34 and 4-29 (Table 4-3). D. Comments noted
Flagstaff, Arizona - October 29, 1996		
Unknown Speaker	A. The speaker stated that it would be helpful to mention what other interested parties are involved in the EIS process.	A. The lead and cooperating agencies involved with NTP are listed on page 5-6 (Figure 5-3) of the DEIS.
Mike Macauley	A. The speaker explained that he had sent two letters in 1993 regarding the project but had not yet received responses to the letters. He questioned whether the letters would be considered or if he would have to resubmit the letters once again. B. The speaker indicated that he had received all the updates but had not received a copy of the EIS despite being on the list to receive a copy.	A. Western replied to Mr. Macauley's letters (10/01/93 and 11/23/93) with a letter dated 01/05/94. Mr. Macauley's letters are a part of the project record. B. A copy of the DEIS was sent to Mr. Macauley on November 5, 1996.
Anna Frazier (Diné Care)	A. Ms. Frazier expressed concern that "probably over 50 percent" of Navajo people do not have electricity in their homes. She stated that the energy that is generated on the Navajo Reservation is given to people outside of the reservation (e.g., Arizona, California, and Nevada) as opposed to people on the reservation.	A. See response to Issue 2 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Anna Frazier (Diné Care) (continued)	B. Ms. Frazier also expressed concern about the depletion of natural resources (e.g., coal) on the Navajo Reservation and the use of resources (e.g., uranium and coal) taken from reservation lands for use outside the Navajo Nation. She explained that the Navajo Nation government is just concerned about money associated with natural resource operations. Ms. Frazier expressed concern regarding the misuse of energy (e.g., air conditioning) in California. C. She stated that the Navajo people are suffering from respiratory problems associated with the ongoing operations of Peabody Coal and BHP. D. Finally, the speaker inquired as to where in the western United States are other sources of power being generated.	B. Comment noted C. Comment noted D. Major generating stations and power plants in the western United States are indicated as dots on Figure 1-2 in the DEIS.
Ivan Joe (Diné Care)	A. Mr. Joe wanted to know if references could be provided for studies cited in the EIS suggesting that EMFs are not dangerous or cancer causing. B. He inquired whether the above-referenced studies were conducted under similar conditions as the proposed line would exist. Mr. Joe stated that he would like information regarding the effects of EMFs on range land, native plants, and crops.	A. The references are listed in the DEIS on pages 4-51 to 4-56. B. The studies referenced in the DEIS were conducted under a variety of conditions, many of which are pertinent to NTP. The information regarding the effects of EMF on rangeland, native plants, and crops are described on pages 4-55 and 4-56 of the DEIS.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
Issue 3 - Health and Safety	Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Ivan Joe (Diné Care) (continued)	C. He also wanted to know what types of land uses (e.g., grazing) would be allowed within the right-of-way.	C. As explained in the DEIS on page 2-33, compatible uses in the right-of-way on public lands would be considered and approved by the project proponents and the land-managing agency. Permission to use the right-of-way by private landowners would have to be obtained from the owner of the transmission line. Examples of uses generally permitted within the right-of-way include grazing, most crop production, vehicle access, low-growing trees, open storage areas, corrals, and stock tanks.
	D. The speaker explained that a statement on page 4-77 of the EIS explaining that "air quality cumulative impacts should not increase over levels currently permitted" conflicts with a statement on page 4-78 of the EIS explaining that "significant cumulative impacts on residences could potentially occur if NTP were to be paralleled by a second line in the future."	D. These statements are not related. The significant cumulative impacts on residences described on page 4-78 of the DEIS is in regard to the potential displacement of residences by an additional line, not air quality.
	E. Mr. Joe questioned if there were plans in the future for another line to parallel NTP and, if so, what would be the total required right-of-way.	E. As explained in the DEIS, page 2-15, the Resources Committee of the Navajo Nation Council granted a conditional right-of-way to accommodate the 250-foot-wide right-of-way required by NTP as well as an additional right-of-way for a potential future transmission line; combined, both rights-of-way total 400 feet wide. Currently, no firm plans or proposals for another transmission line have been identified.
	F. Additionally, he wanted to know what types of reclamation would be provided (e.g., broadcast, drilled, etc.) and who would be responsible in the event that reclamation attempts were unsuccessful.	F. Reclamation and mitigation measures for NTP are generally described on pages 2-20 to 2-29 and 2-36. Generic mitigation measures are shown on Table 2-3 and selective mitigation measures on Table 2-7. DPA will be responsible for completion of reclamation.

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Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Ivan Joe (Diné Care) continued	G. Mr. Joe inquired whether or not an economic analysis had been conducted to determine projected power requirements for the next 50 years and also a market analysis to compare the market for hydroelectric versus coal-powered generation.	G. Forecasts for power needs are typically estimated for a shorter time period than 50 years. As stated in the DEIS on page 1-3 "An estimate of future load growth in Arizona, Nevada, and southern California, based on conservative assumptions, is more than 10,000 megawatts (MW) during the next 10 years." Power generation is not a part of this project; therefore, a market analysis to compare the market for hydropower versus coal-powered is not relevant to this project. As explained in the DEIS on page 1-3, the purpose of the project is to relieve constraints on the transmission of electricity west from the Four Corners area to the Desert Southwest. "Currently, more energy can be imported from the north on existing transmission lines into the Four Corners area than is capable of being exported with existing transmission capacity to the west."
	H. The speaker wanted to know what monetary returns could be expected from NTP.	H. Although DPA has completed calculations, they are preliminary. The amount of revenue would depend on final percent of ownership, right-of-way costs, lease agreements, operation and maintenance costs, and availability of capacity (DEIS, page 1-6).
	I. Finally, Mr. Joe questioned if more long-term employment opportunities could be created by building a substation.	I. Typically, substations do not require an employee to be on the premises full time. Therefore, building a substation would contribute minimally to long-term employment opportunities.

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Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Mike Macauley	A. Mr. Macauley explained that he owns property somewhere near the "proposed alternate route to the south."	A. Comment noted
	B. He stated that he had a concern regarding the power outage that was caused earlier in the year as a result of a tree and a power line coming in contact. The speaker inquired as to what measures would be taken with regards to the maintenance and removal of the piñon-juniper habitat under the proposed line.	B. As explained in the DEIS, pages 2-26 to 2-27, mature vegetation within or adjacent to the right-of-way would be removed under or near the conductors to provide adequate electrical clearance as required by NESC and DOE order WAPA 6460.1. Trees that could fall onto the transmission line, affect the transmission line during wind-induced conductor swing, or otherwise present an immediate hazard to the transmission line would be removed. If a conflict were to arise regarding clearance procedures, the conflict would be reviewed and agreed on by the project proponents and land managers or owners.
	C. Mr. Macauley also questioned how the financial value of private property near the proposed line would be affected as a result of associated visual impacts.	C. Recent studies are inconclusive regarding the devaluation of property based on the visual impact of transmission lines.
	D. He stated that some of the Coconino County Board of Supervisors were unaware of the project and explained that this is "not a condemnation type of situation" and that NEPA requires the cooperation of local, city, county, and state governments before such projects can begin.	D. The environmental studies conducted for NTP have included an extensive public involvement program, including input from local, city, county, and state government agencies as described in Chapter 5 of the DEIS. See response to Issue 4 in FEIS Chapter 1
	E. Finally, Mr. Macauley questioned why Native Americans on the reservation are bypassed to provide power for people off the reservation.	E. See response to Issue 2 in FEIS Chapter 1

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Peach Springs, Arizona - October 29, 1996		
Edgar B. Walema (Vice-Chairman, Hualapai Tribe)	A. Mr. Walema explained that he received the EIS only "five minutes" before he closed his office on the day of the public hearing.	A. Comment noted
Lena Bravo	A. Ms. Bravo stated that in reading a document she learned that the line would be constructed and that the people would get something for right-of-way access. B. However, she inquired why the Hualapai people could not receive electricity from the proposed line. C. Ms. Bravo also questioned if compensation for the right-of-way would be a one-time settlement.	A. See response to Issue 5 in FEIS Chapter 1 B. See response to Issue 2 in FEIS Chapter 1 C. See response to Issue 5 in FEIS Chapter 1
Monza Honga	A. The speaker indicated that copies of the EIS were received "a few days ago" and inquired "where the ones (copies of the EIS) came maybe last week."	A. Comment noted
Dolan Springs, Arizona - October 30, 1996		
Claude Thorpe (Chamber of Commerce President; Dolan Springs, Arizona)	A. Mr. Thorpe explained that he was aware of the locations of the proposed alternative routes and stated that if electricity is needed in those areas that it would be going through those places, but stated that if water is the problem then that is an entirely different issue.	A. Comment noted

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
George Watson	A. Mr. Watson stated that Dolan Springs could have a "bright future" if the water problem in the area could be resolved. B. The speaker stated that a lot of people were unable to attend the hearing because they had to go to work. Mr. Watson explained that he, his wife, and Mr. Thorpe (Chamber of Commerce President) would be able to provide information to people unable to attend the hearing at the next Chamber meeting.	A. The water problem to which Mr. Watson refers is not associated with NTP. B. Comments noted
Boulder City, Nevada - October 30, 1996		
Bill Burke (National Park Service)	A. Mr. Burke explained that an on-site biologist, hired by the NPS and paid for by the project proponents, would be required in order to oversee construction of the proposed line within park boundaries. He explained that this was required of the most recently developed line and that this would better ensure the protection of NPS interests and concerns. The speaker stated that this would enable the biologist to confer with NPS staff to come to decisions on right-of-way issues. He explained that some things that happened in the past were against NPS Service policy. B. Finally, Mr. Burke suggested that transmission line structures crossing park boundaries be large enough to accommodate future lines so as to reduce the need for additional right-of-way in the area.	A. Comment noted B. Mr. Burke's comment is noted; however, towers large enough to accommodate future lines (double circuit) are not being proposed for NTP.

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Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Kykotsmovi, Arizona - January 9, 1997		
Wayne Taylor (Vice Chairman)	A. Mr. Taylor explained that the NTP had been in process for some time and that the Hopi Tribe had been involved to some degree through the Hopi Cultural Preservation Office. The speaker indicated that Mr. Kurt Dongoske has been primarily responsible for representing the Hopi Tribe on matters related to the environmental studies. Mr. Taylor also explained that members representing NTP have been conducting public hearings for the past several months in areas that will be impacted by the project. Finally, the speaker indicated that public notices were distributed prior to the hearing informing people of the hearing and, as a result, expected a sizeable turnout.	A. Comments noted
Arnold Taylor (Hopi Tribe Department of Natural Resources; Manager)	A. Mr. Taylor requested an explanation and overview of the location of the environmentally preferred and other alternative routes. The speaker stated that an overview of the routes for the group in attendance was necessary because the Hopi Tribe has been involved with the project from its inception through the EIS process and because there were new Tribal members present who had not yet been exposed to the project.	A. An explanation and overview of the location of the transmission line routes were provided later in the meeting.
	B. Mr. Taylor inquired as to what the difference in mileage and costs would be in comparing the environmentally preferred route (K1) and the central routes (C1 and C2) between the Shiprock and Moenkopi substations.	B. Mileage and estimated costs are shown in the DEIS on page 4-29 (Table 4-3).
	C. The speaker also wanted to know if the issue of cost was going to be a consideration in the selection of the final route and if shorter routes (e.g., C1 and C2) would be considered "even if the area is environmentally better."	C. Cost comparisons will be considered in the selection of the final route. Although route length will be taken into consideration, the evaluation and selection of alternative routes are more generally based upon those resources with the potential for the highest levels of impact, including land use, visual and cultural resources.

Key:

Issue 1 - Distribution of Project Revenues
Issue 2 - Local Electrical Benefits
Issue 3 - Health and Safety
Issue 4 - Public Planning Process
Issue 5 - Right-of-way
Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Arnold Taylor (Hopi Tribe Department of Natural Resources; Manager) (continued)	D. Additionally, Mr. Taylor questioned if Federal funds would be used in constructing NTP and/or if NTP would use such funding in the future. E. Mr. Taylor stated that the Navajo Tribe would benefit in many ways as a result of this project including employment opportunities and scholarships for families. F. Finally, the speaker inquired as to how much revenue could be expected from the project during its peak period.	D. As currently planned, construction of NTP will not involve Federal funds. E. Comment noted F. Although DPA has completed some calculations, they are preliminary. The amount of revenue would depend on final percent of ownership, right-of-way costs, lease agreements, operation and maintenance costs, and availability of capacity (DEIS, page 1-6).
Steve Youvella (First Mesa Council Representative)	A. Mr. Youvella, stating that they should concentrate on the central routes, wanted to know what kinds of benefits the Hopi Tribe would receive if NTP was to cross their lands. B. The speaker also inquired who the beneficiaries of the project would be. C. Finally, Mr. Youvella questioned as to what type of ground-level impacts the power line would create (e.g., impacts on vegetation as it relates to the ability to continue grazing and human and livestock health effects).	A. The Hopi Tribe would receive compensation for the right-of-way crossing the Hopi Reservation. However, the preferred route does not cross the Hopi Reservation. B. As explained in the DEIS, pages S-2, 1-1 and 1-3, NTP would relieve constraints on the transmission of bulk power west from the Four Corners area to the desert southwest in an effort to meet the demands of customers in south-central Arizona, Nevada, and southern California. See response to Issue 1 in FEIS Chapter 1 C. As explained in the DEIS on page 2-33, grazing, along with several other uses, would be a generally permitted land use upon having been granted permission by the owner of the transmission line. With regards to the effects of transmission lines on the health of humans and livestock, see response to Issue 3 in FEIS Chapter 1.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
Issue 3 - Health and Safety	Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Eugene Kaye (Hopi Tribal Council, Moenkopi)	A. Mr. Kaye inquired what the capacity of the line is that runs from the Shiprock Substation to Page, Arizona. Additionally, Mr. Kaye wanted to know if this line is currently being used at full capacity. B. The speaker also wanted to know what occurs after the DEIS is complete in terms of the involvement of the Hopi Tribe. C. Mr. Kaye explained that the portions of the proposed central routes (C1 and C2) that cross the Hopi Reservation fall within an established energy corridor. He pointed out that the existing APS line falls within this energy corridor and that "the 1934 case (APS line) is not really all that final either." D. Finally, Mr. Kaye stated that the existing route (C1) is the most preferable because it has been declared an energy corridor within the Hopi Reservation and the route has already been disturbed in the Chuska Mountain area.	A. As explained in Chapter 1 of the DEIS, the existing line that parallels the preferred route is 230kV and is currently operating at full capacity. B. Subsequent to the completion of the DEIS, a total of 44 public hearings were held throughout the project area to obtain public comments on the document and project—one of the hearings was held at Kykotsmovi, Arizona on January 9, 1997. Further involvement of the Hopi Tribe will be dependent on the location of the final route. C. Comment noted D. Comment noted
Richard Nayatewa (First Mesa Representative)	A. Mr. Nayatewa requested an explanation as to why an excess amount of electricity existed in the Four Corners area and questioned whether or not existing lines could alleviate the excess amount of electricity. B. Mr. Nayatewa also inquired if the existing lines paralleling the environmentally preferred route would serve as back-ups for NTP.	A. As explained in the DEIS, pages S-2 and 1-3, there is currently more energy being imported from the north on existing transmission lines into the Four Corners area than is capable of being exported with existing transmission capacity to the west. The existing system is fully committed to transmitting energy from the Four Corners area and is generally heavily loaded, causing periodic cutbacks to keep flows within established limits. B. NTP could, to the extent practicable, serve as a back-up to paralleling lines in the event that a failure occurred.

Key:
- Issue 1 - Distribution of Project Revenues
- Issue 2 - Local Electrical Benefits
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Richard Nayatewa (First Mesa Representative) (continued)	C. The speaker also wanted to know if the power lines crossing the Hopi Reservation are single lines each equaling 500 kV or multiple lines totaling 500kV.	C. The transmission line that crosses the Hopi Reservation is a single 500kV transmission line.
	D. He also wanted to know if APS would be involved in this project.	D. As explained in Chapter 1 of the DEIS, the involvement of utility companies would be determined through future contract negotiations.
	E. Mr. Nayatewa inquired who would actually benefit from NTP and if the line was being constructed in order to meet demands in Nevada and southern California. He questioned if the Hopi and Navajo tribes would lose benefits as a result of the demand outside of the reservations.	E. As explained in the DEIS, pages S-2, 1-1 and 1-3, NTP would relieve constraints on the transmission of bulk power west from the Four Corners area to the desert southwest in an effort to meet the demands of customers in south-central Arizona, Nevada, and southern California. See response to Issue 1 in FEIS Chapter 1.
	F. Mr. Nayatewa stated that although lines cross reservation lands those outside the reservation actually control the lines.	F. Mr. Nayatewa's comments have been noted. However, unlike existing transmission lines crossing reservation lands, NTP is an opportunity for the Navajo Nation to own and operate a transmission line that would be an integral part of a regional electrical distribution system in the western United States.
	G. The speaker inquired why Western is proposing to construct power lines across tribal lands when there are many substations already in existence in Laughlin and southern California.	G. As explained in Chapter 1 of the DEIS, the existing transmission system is fully committed to transmitting energy from the Four Corners area and is generally heavily loaded. As a result, the use of existing substations in Laughlin, Nevada and southern California would not serve the need to relieve transmission constraints west of the Four Corners area.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
Issue 3 - Health and Safety	Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Richard Nayatewa (First Mesa Representative) continued	H. Mr. Nayatewa wanted to know what type of relationship exists between the Navajo and Hualapai tribes and if the line would avoid or cross the Hualapai Reservation; he believed the line would avoid the Hualapai Reservation.	H. As explained in the DEIS, Chapters 1 and 5, DPA has been cooperating with the Hualapai Tribe throughout preconstruction activities. Based upon the environmental studies, the environmentally preferred route would cross the Hualapai Reservation.
	I. The speaker inquired as to how much input Western would have in selecting the final route and if Western would appear before those affected by the line or if they simply construct the line where they think it is most suitable.	I. As explained in the DEIS, page 2-42, the Administrator of Western will file the Record of Decision, which will include, among other things, a decision on the preferred route. Subsequent to the decision, individuals living or using lands crossed by the project right-of-way would be contacted and informed about the project by DPA.
	J. He wanted to know if Peabody would be involved and what would happen if the Hopi and Navajo agreed not to send anymore coal to Laughlin.	J. At this time, there are no plans to involve Peabody Coal in this project. Whether or not Laughlin, Nevada received coal from the Navajo Nation and/or Hopi Tribe is beyond the scope of this project. Consequently, neither DPA or Western is able to provide this information.
	K. Finally, Mr. Nayatewa inquired how long the contract for this project is.	K. As proposed, NTP would have a useful life estimated to be at least 50 years. With regards to contracts for this project, it is too early in the project to determine which utility companies will lease transmission capacity from NTP and for what duration the contracts would be.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Caleb Johnson (Council Representative)	A. Mr. Johnson inquired whether or not the generating station in Shiprock is Navajo-owned.	A. There are two generating stations/power plants in the vicinity of Shiprock, New Mexico. The first is the San Juan Generating Station, which is located approximately 14 miles northeast of Shiprock, New Mexico. The San Juan Generating Station is owned by a consortium of utility companies and municipalities including the following: Public Service of New Mexico, Tucson Electric Company, Imperial Irrigation District, Tri-State, Modesto/Santa Clara/Redding Public Power Agency, Utah Associated Municipal Power Agency, City of Anaheim (CA), City of Asuza (CA), City of Banning (CA), City of Colton (CA), City of Farmington (NM), City of Glendale (CA), and the City of Las Alamos (NM). The other is the Four Corners Power Plant, which is located approximately 13 miles east of Shiprock, New Mexico and is owned by Arizona Public Service, Public Service of New Mexico, Salt River Project, El Paso Electric Company, Tucson Electric Company, and Southern California Edison. The Shiprock Substation is located approximately six miles northeast of Shiprock, New Mexico and is owned by Western.
	B. The speaker also wanted to know if DPA was going to buy power from the Shiprock generating station and ship it across the proposed line.	B. As part of this project, DPA does not intend to buy power and transmit it across NTP. Rather, DPA will lease the capacity of the proposed transmission line to other utility companies such that they are able to transmit their power across NTP. At this stage in the project, it is too early to know which companies would participate in NTP.

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
Issue 2 - Local Electrical Benefits	Issue 5 - Right-of-way
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Caleb Johnson (continued)	C. Mr. Johnson explained that he was very hesitant to work with the Navajo Tribe because the Hopis have had problems with them in the past. D. He stated that he did not want the line crossing the Hopi Reservation unless the Hopi Tribe was given a significant amount of control over the line as well as some profits. E. Mr. Johnson explained that if the line was going to be built within the Hopi Reservation it should be done so along the existing APS line because that area has already be disturbed.	C. Comment noted D. Comment noted E. Comment noted
Norman Hohnani	A. Mr. Hohnani stated that this project is being proposed as a result of the demand that exists. B. The speaker stated that the coal reserves generating power in the Four Corners area may play a key role in the development of NTP. C. Also, the speaker wanted to know from where coal reserves used at the Four Corners generating station were coming from. D. Mr. Hohnani explained that the Laughlin plant also needs to be considered and may play a key role as it is his understanding that the plant may be terminated in the future. E. Finally, the speaker stated that Western's foresight in controlling the grid system in the western United States has long been overplayed and that support from the Hopi Tribe for wanting the line through their reservation will come as a result of the Navajos having a role in the transmission of electricity.	A. Comment noted B. At this early stage in the project, it is uncertain whether or not coal reserves in the Four Corners area will play a part in the development of NTP. C. Because the operations of the Four Corners Generating Plant are not associated with this project, Western and DPA have no knowledge of where coal reserves used at the above plant come from. D. As planned, this project will not utilize energy produced from the generating plant in Laughlin, Nevada. E. Comment noted

Key:

Issue 1 - Distribution of Project Revenues
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Issue 4 - Public Planning Process
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TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Unknown Speaker	A. The speaker wanted to know what the life of the mines in the Four Corners area are.	A. Because the mining operations to which the speakers refer are not associated with this project, Western and DPA have no knowledge of what the life of the mines are in Four Corners area.
Willard Sakiestewa (Hopi Tribe Treasurer)	A. Mr. Sakiestewa wanted to know what the projected revenues for this project are for the next five years.	A. As currently planned, the transmission line would not be in service until the year 2001. Although DPA has completed some calculations of revenue, they are preliminary. The amount of revenue would depend on final percent of ownership, right-of-way costs, lease agreements, operation and maintenance costs, and availability of capacity (DEIS, page 1-6).
	B. The speaker also inquired as to what the total cost of the project would be for that portion of the project crossing the Hopi Reservation.	B. Alternative routes C1 or C2 cross the Hopi Reservation for 32.2 miles (DEIS, Table E-3 on page E-8). Based on estimated costs shown in the DEIS, Table 4-3 on page 4-29, estimated costs (in constant 1995 dollars) are $107,000 per mile for right-of-way acquisition, and $449,000 per mile for transmission line construction.
	C. Mr. Sakiestewa questioned how much of the project would be funded by grants and loans.	C. Funding for the project has not been fully identified at this time.
	D. Finally, the speaker explained that if the project was going to be profitable, the Hopi Tribe should consider investing in the line.	D. Comment noted
Tim Keevana (Administrative Manager from the Village of Mishongnovi)	A. Keevana questioned if the Navajo Nation would be willing to consider a partnership with regards to the ownership of the project. He explained that the project represented a good opportunity for the Hopi Tribe to generate revenues from a source other than the Peabody operation and that the Hopi Tribal Council should look out for the best interests of the Tribe when considering the proposed project.	A. The preferred route does not cross the Hopi Reservation.

Key:
- Issue 1 - Distribution of Project Revenues
- Issue 2 - Local Electrical Benefits
- Issue 3 - Health and Safety
- Issue 4 - Public Planning Process
- Issue 5 - Right-of-way
- Issue 6 - Employment

TABLE A-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF PUBLIC HEARING COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Robert Sakiestewa, Jr. (Governor of Upper Village)	A. Mr. Sakiestewa explained that the Tribe was still in litigation over the 1934 case (APS line.) and that he was concerned about the impacts of the proposed line on the cultural and religious ways of the Hopi Tribe (e.g., shrine areas).	A. Comment noted. However, as explained in the DEIS, cultural resources have been and will continue to be an important consideration. See DEIS Chapter 2, pages 2-35 to 2-42; Chapter 3, pages 3-76 to 3-92; Chapter 4, pages 4-58 to 4-74; Chapter 5; and Appendix A.
Kurt Dongoske (Hopi Tribe Archaeologist)	A. Mr. Dongoske explained that the route going through the Hopi Reservation is not an environmentally preferred route. The speaker also explained that in 1992-1993 a survey regarding Hopi concerns was conducted from the Four Corners area, over to Las Vegas, and from Kykotsmovi down to Winslow. Mr. Dongoske stated that in doing the surveys, they used information collected during the Eeling-versus-Jones case in 1882, including locations of shrines, eagle shrines, collection areas, and "other important geographical areas for Hopis." Additionally, he explained that Lands Claims Commission records were reviewed as well as documentation in the National Archives at the Smithsonian Institute in Washington, D.C. In doing this research, Mr. Dongoske stated that the alternative routes to the north were more environmentally preferable while the routes crossing and to the south of the Hopi Reservation "would impact a lot of traditional places of Hopi concern (e.g., eagle shrines, traditional collecting areas, springs, and agricultural areas).	A. Comments noted

Key:

Issue 1 - Distribution of Project Revenues	Issue 4 - Public Planning Process
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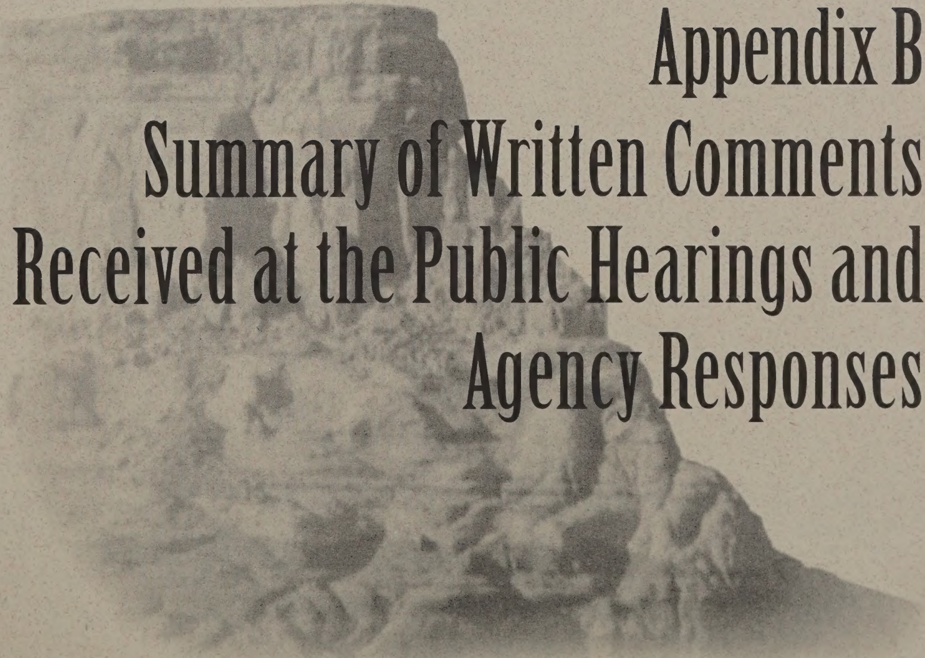

Appendix B

Summary of Written Comments Received at the Public Hearings and Agency Responses

TABLE B-1f
LIST OF PARTIES WHO PROVIDED WRITTEN COMMENTS AT THE PUBLIC HEARINGS

The following is a list of individuals who submitted written remarks on comment forms at the public hearings. The date of each hearing and the individuals are listed below. Their comments are summarized and responded to in Table B-2f.

No.	Commenter	Representing
1.	Edward Tapana	Self
2.	Dr. Edward R. Garrison	Navajo Community College
3.	Martha Austin	Self
4.	Bijiibaa' Garrison	Self
5.	Cecilia D. Nelson	Self
6.	Larry E. Jim	Self
7.	Evelyn Acothley	Self
8.	Diana M. Williams	Self
9.	Frankie Begay	Self
10.	Deneh T. Bitsui, Sr.	Self
11.	Helen and Andrew White	Selves
12.	Ruth and Johnson Peshlakai	Selves

TABLE B-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF WRITTEN COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Edward Tapana Montezuma Creek, UT	A. Mr. Tapana stated that he supports the line through the southern part of the Red Mesa Chapter as revenues associated with the project would benefit the Navajo Tribe. He also explained that the project would be beneficial so long as the "necessary paper work is established and a proper channel system is developed." B. Finally, Mr. Tapana urged that safety measures be imposed to safeguard against health problems.	A. Comments noted B. See response to Issue 3 in FEIS Chapter 1
Dr. Edward R. Garrison Navajo Community College Shiprock, NM	A. Dr. Garrison wants "exact details" regarding the precise location of the proposed line in relation to the existing 230kV line in the Marsh Pass area (Link 561).	A. At the time of the public hearings, no decision about the project had been made. As described in the DEIS on pages C1 and C2 and shown on Figure C-1 (Photograph No. 3), Link 561 on alternatives GC1 and K1 (the environmentally preferred alternative route) is located approximately 0.5 to 1 mile south of the existing 230kV line, in Marsh Pass. The decision will be documented in the Record of Decision following the issuance of this FEIS.

Key:

Issue 1 - Distribution of Project Revenues
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TABLE B-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF WRITTEN COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Dr. Edward R. Garrison Navajo Community College Shiprock, NM (continued)	B. Also, he wants detailed information explaining where the proposed route would cross U.S. Highway 64 in the Waterflow, New Mexico area in relation to the existing line between mileposts 34 and 35.	B. As stated above, no decision about the project had been made at the time of the public hearings. As described in the DEIS on page C2, the alternative that crosses US Highway 64 near Waterflow would be located parallel to and immediately west of the two 345kV transmission lines running north and south in this area. Figure C-1 (Photograph 11) illustrates the location of this alternative immediately south of US Highway 64 at the crossing of the San Juan River.
	C. Dr. Garrison questioned if views from the U.S. Highway 64 scenic overlook (Black Mesa Junction/Peabody), looking into Longhouse Valley, were considered and also if these views are within the National Monument boundary.	C. State Highway 564 provides access to the Navajo National Monument. As explained on page 3-66 of the DEIS, both State Highway 564 and US Highway 160 in the Longhouse Valley area are scenic roads. Impacts on views from these roads were considered in the evaluation of alternatives. Views from within the National Monument boundary would be limited due to terrain and vegetation screening.

Key:

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TABLE B-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF WRITTEN COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Martha Austin Kayenta, AZ	A. Ms. Austin resides in the Marsh Pass-Tsegi area and stated that she would not like another line near her home. B. She stated that there are already enough power, oil, and telephone lines in the area and that if the line were to be constructed in the Marsh Pass-Tsegi area she would like the line placed underground because "we do not need to see the ugly power line over our heads." C. Ms. Austin also explained that they have no right-of-way in the Marsh Pass-Tsegi area to build permanent houses. D. Finally, Ms. Austin stated that she grazes livestock in the area and that she has neighbors who oppose the line.	A. Comment noted B. As explained in the DEIS, pages S-4 and 2-4 to 2-5, placement of NTP underground was not considered a viable alternative and was eliminated from further consideration because of technical complications, economic cost, environmental impacts, and accessibility for maintenance. C. Comment noted D. Comments noted
Bijiibaa' Garrison Kayenta, AZ	A. Mr. Garrison lives in the area with his family and stated that he is against the transmission line because it is too dangerous to build near family homes. He explained that there is already enough electricity in the area and that one can hear the existing line "sizzling" and "popping" when walking next to it. Mr. Garrison stated that many families and their livestock live near the existing line and that it is too "hazardous and dangerous to live near high voltage power lines." B. Finally, Mr. Garrison explained that people are just looking for the money associated with the project and don't care about anyone else's opinion.	A. See response to Issue 3 in FEIS Chapter 1 B. Comments noted

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TABLE B-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF WRITTEN COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Cecilia D. Nelson Shiprock, NM	A. Ms. Nelson stated that her land is somewhere in Area 74 "about fifteen miles below on west side from here" (Chapter house). B. Finally, Ms. Nelson explained that she would like to receive newsletters.	A. No response needed B. A copy of the newsletters have been sent to Ms. Nelson.
Larry E. Jim Shiprock, NM	A. Mr. Jim stated that he was in favor of running the power line parallel with the existing line because he believes that the existing line is "pretty well accepted across our landscape." B. He also explained that the project would help the economy in the Four Corners area. C. Finally, Mr. Jim stated that he was somewhat concerned about the effects of EMFs but that his questions were answered by a representative in attendance at the Cudeii Chapter.	A. Comment noted B. Comment noted C. Comment noted
Evelyn Acothley Tuba City, AZ	A. Ms. Acothley stated that the Bodaway/Gap Chapter should create a partnership agreement for the sharing of revenues associated with the line as monies generated from the project should be directed to benefit the people of the local community. Ms. Acothley urged that the request for the Bodaway/Gap to receive funding be considered.	A. See response to Issue 1 in FEIS Chapter 1
Diana M. Williams Tuba City, AZ	A. Ms. Williams explained that it will be beneficial to receive electricity associated with the line instead of having to use oil lamps. She stated that this will benefit herself and the people because electricity is needed in the Inscription House area.	A. See response to Issue 2 in FEIS Chapter 1

Key:

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NAVAJO TRANSMISSION PROJECT
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Commentor	Comments	Response
Frankie Begay Chinle, AZ	A. Mr. Begay explained that, after reviewing the facts, the best route appears to be the northern alternative, which bypasses the Hopi Reservation. He stated that all other issues aside (e.g., environmental and right-of-way clearance) avoiding another dispute with the Hopi Tribe seems practical and logical. B. Mr. Begay explained that the economic impacts of the project would appear to be favorable to the Navajo Nation and that this might allow the Navajo Tribe to depend less on the Federal government for money. C. Finally, he stated that if the project becomes a reality the Navajo Nation needs to be given equal participation in decision making, ownership, and regulation of the line in order for it to be successful.	A. Comment noted B. Comment noted C. As currently planned, DPA would be the majority owner of the line and would be responsible for the construction, operation, and maintenance of the line.
Deneh T. Bitsui, Sr. Chinle, AZ	A. Mr. Bitsui explained that he is satisfied with the electricity that he is using now and expressed concern that there would be many "side effects" associated with the proposed power line.	A. See response to Issue 3 in FEIS Chapter 1

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TABLE B-2f
NAVAJO TRANSMISSION PROJECT
SUMMARY OF WRITTEN COMMENTS AND AGENCY RESPONSES

Commentor	Comments	Response
Helen and Andrew White Kayenta, AZ	A. The commentors stated that they lived somewhere in the Kayenta area and believed that the project was a "very good" idea as they need electricity to their residence. They stated that they have been using a kerosene lamp, white gas, and a propane stove in their home. Also, they explained that they have been getting wood, coal, water, and gas for the last 22 years. B. Both urged that the power line "look good" and that "we don't end up paying for the power line." C. They expressed appreciation for the opportunity for such a project and thanked those who are involved.	A. See response to Issue 2 in FEIS Chapter 1 B. Comments noted C. Comments noted
Ruth and Johnson Peshlakai Red Valley, AZ	A. Mr. Johnson agreed with the environmental impact statement and explained that the project could provide employment opportunities.	A. Comments noted

Key:

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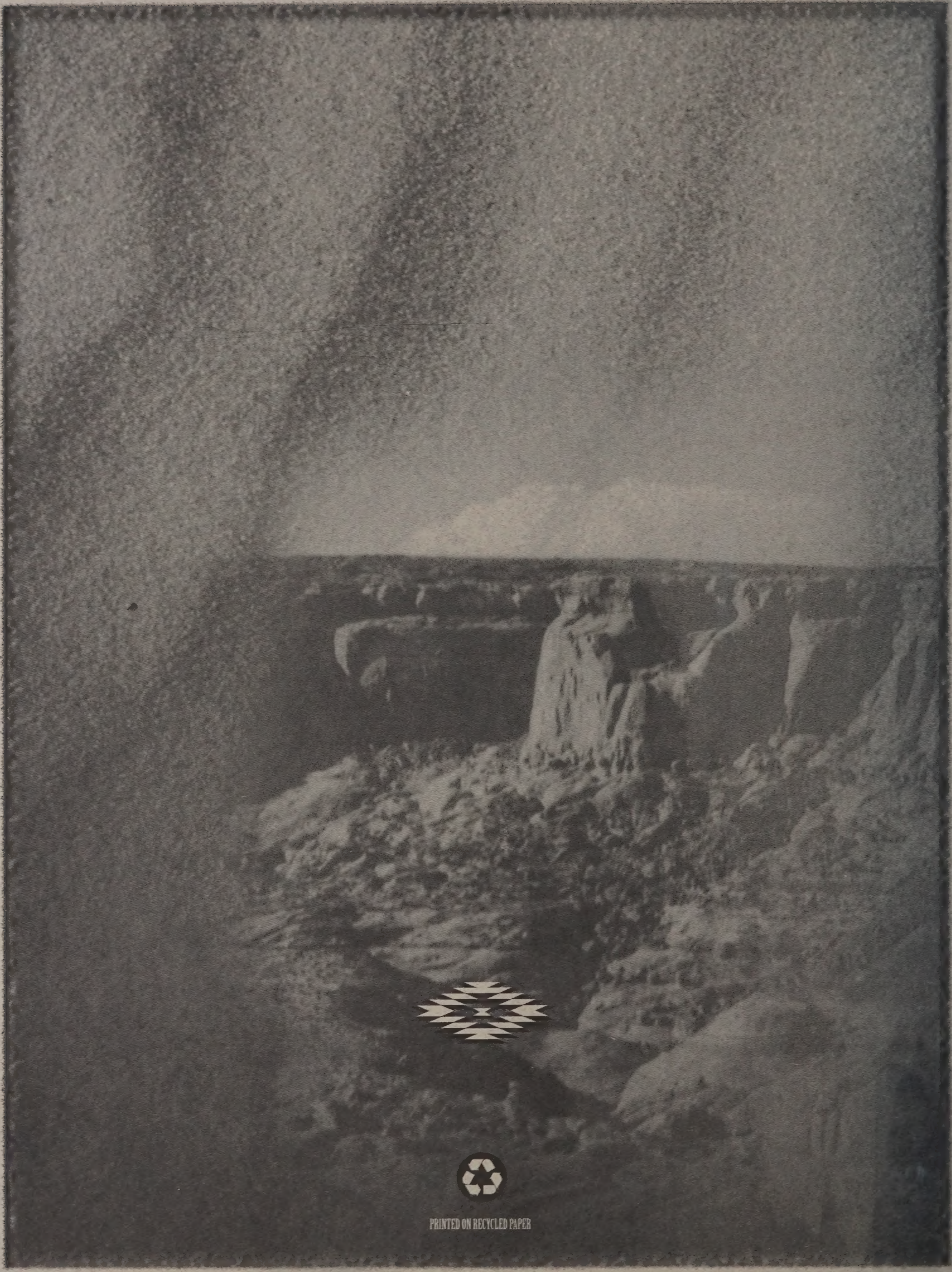

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